



Staff Handbook

This staff handbook serves as your guide to understanding our organization's values, policies, and procedures, ensuring that together, we create a nurturing and professional environment for both our staff and the individuals we serve.

At Nova Healthcare Services Ltd., we believe in the power of teamwork, compassion, and continuous improvement. This handbook outlines the principles and standards that define our agency, emphasizing our shared dedication to delivering high-quality healthcare while maintaining a supportive and inclusive workplace culture.

As you embark on this journey with us, we encourage you to familiarize yourself with the contents of this handbook. It not only serves as a reference for your day-to-day responsibilities but also as a resource for understanding the expectations and values that guide our agency.

- **Our Purpose**

Nova Healthcare Services (Nova HCS) stands firm in its purpose to revolutionize healthcare recruitment by meticulously connecting top-tier healthcare professionals with institutions dedicated to delivering outstanding patient care. We are driven by the conviction that the right match between healthcare providers and facilities not only enhances the quality of care but also fosters a harmonious and thriving healthcare ecosystem.

At the heart of our purpose is a commitment to facilitating partnerships that go beyond traditional staffing solutions. Nova HCS is dedicated to being a catalyst for positive change, contributing to the overall well-being of individuals and communities by ensuring that healthcare providers find positions that align with their skills, values, and professional aspirations.

- **Our Scope**

Nova HCS operates on a broad spectrum within the healthcare industry, catering to the diverse needs of both healthcare professionals and institutions. Our scope encompasses the recruitment of a wide range of professionals, including but not limited to nurses, physicians, therapists, administrative staff, and other allied healthcare professionals.

We collaborate with healthcare facilities of varying sizes, from community clinics to large hospital networks, recognizing the unique requirements of each institution.

Nova HCS strives to be the go-to partner for organizations seeking exceptional talent and for healthcare professionals searching for fulfilling career opportunities.

Our scope extends beyond traditional staffing by providing tailored solutions, such as temporary placements, permanent placements, and strategic staffing consultations. Nova HCS is committed to being a dynamic force in the healthcare recruitment landscape, continuously adapting to industry trends and the evolving needs of both our clients and candidates.

In fulfilling our purpose and embracing our scope, Nova HCS seeks to be a trusted bridge that connects talent with opportunity, fostering a healthcare workforce that thrives and, ultimately, positively impacts patient outcomes and experiences.

- **Agency Uniform and Identification Cards**

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- **Timesheets**

In the interest of maintaining accurate and organized records, Nova Healthcare Services (Nova HCS) establishes the following guidelines regarding record keeping, specifically timesheets. It is the responsibility of each employee to diligently and accurately maintain their own timesheets, recording work hours, breaks, and any additional relevant information pertaining to their schedule. **You must give your timesheets on Monday by 2 pm, otherwise, there may be a delay in paying You.**

These timesheets should be kept in the employee's personal records for their reference and documentation. Timely submission of timesheets is crucial, as it ensures accurate and prompt processing of payroll and related administrative tasks. Employees are encouraged to review their timesheets for accuracy before submission and promptly address any discrepancies or errors.

Safeguarding personal records, including timesheets, is essential to maintain confidentiality, and employees should take necessary precautions to protect these records from unauthorized access. While personal records are primarily the responsibility of the employee, it's important to note that certain records, including timesheets, may be subject to audit or review by the company for compliance and administrative purposes.

In the event of termination of employment with Nova HCS, employees are required to leave a copy of their timesheets and any other relevant records with the company to ensure the completeness of employment records and facilitate a smooth transition. Nova HCS appreciates the commitment of its staff to maintaining accurate records, fostering accountability, and ensuring compliance with employment and payroll regulations. If you have any questions or require clarification on record-keeping procedures, please contact the HR department for assistance.

- **Training**

Employees will have access to a range of online courses designed to enhance their skills, knowledge, and understanding of industry best practices. These courses cover various topics relevant to healthcare, including but not limited to safety protocols, patient care techniques, and compliance with regulatory standards. Online training provides the flexibility for employees to complete modules at their own pace, allowing for a customized learning experience that accommodates individual schedules.

In addition to online courses, some positions within Nova HCS may require third-party classroom training sessions. These sessions offer a more interactive and hands-on approach, allowing employees to engage in discussions, practical demonstrations, and simulations. Classroom training is designed to complement online learning, providing a well-rounded educational experience that aligns with the specific requirements of certain roles.

It is essential for all employees to actively participate in and successfully complete the prescribed training modules. This not only ensures compliance with industry standards but also equips our workforce with the knowledge and skills necessary to excel in their respective roles.

Completion of training modules will be documented in individual employee records. This information serves as a reference for both the employee and the company, providing a clear overview of the skills and competencies acquired. Additionally, it aids in tracking ongoing professional development and identifying areas for potential further training.

- **Hours of Work**

Work hours at Nova Healthcare Services (Nova HCS) are designed to accommodate the dynamic nature of healthcare and our commitment to providing responsive services. While a standard workweek typically consists of 20 hours for part-time workers and 40 hours for full-time employees, it's crucial to note that these figures are not definitive. As an agency specializing in healthcare services, our workforce plays a vital role in covering emergency shifts and responding to unpredictable demands within the industry.

Part-time employees can expect a standard workweek of 20 hours, providing flexibility while contributing to the essential staffing needs of our clients. Full-time employees are generally scheduled for 40 hours per week, supporting consistent and comprehensive coverage. However, due to the nature of our work in healthcare,

these hours may vary based on client requirements, emergency situations, and the need for immediate staffing solutions.

Employees are encouraged to communicate their availability and preferences to the scheduling department, allowing for a collaborative effort in aligning staffing assignments with individual expectations. While we aim to provide consistency in scheduling, the inherent variability of healthcare demands flexibility and adaptability from our workforce.

- **Holidays and Time off**

Employees are entitled to paid annual leave according to the statutory minimum entitlement under the WTR. The current statutory entitlement to paid annual leave under the WTR is 28 days (prorated for part-time workers).

You must take your annual leave during the Leave Year in which it accrues and, except as may be set out in the relevant Assignment Details Form or any variation to the relevant Assignment Details Form, you may not carry over any annual leave to the next year. You are responsible for ensuring that you request all the paid annual leave you are entitled to and that you take it during the relevant Leave Year.

- **Conduct whilst on company business**

At Nova Healthcare Services (Nova HCS), maintaining a high level of professionalism is integral to our commitment to excellence. Whether engaged in regular work hours, shadow shifts, or training, employees are expected to adhere to a code of conduct that reflects the values and standards of our organization.

During scheduled work hours, employees are expected to demonstrate punctuality, dedication, and a strong work ethic. Consistent attendance and adherence to assigned schedules contribute not only to individual success but also to the overall effectiveness of our healthcare services.

Participation in shadow shifts is an opportunity to observe, learn, and integrate into various roles within our organization. While engaged in shadowing, employees are expected to approach the experience with professionalism, curiosity, and a commitment to learning. Respect for the privacy and responsibilities of colleagues and clients is paramount during shadow shifts.

Training sessions, whether online or in a classroom setting, are vital components of professional development. Employees are expected to actively engage in training activities, demonstrating attentiveness, participation, and a commitment to acquiring the knowledge and skills necessary for their roles.

In all aspects of the company business, professionalism is non-negotiable. This includes respectful communication with colleagues, clients, and individuals receiving care. Upholding confidentiality, adhering to ethical standards, and maintaining a positive attitude contribute to a harmonious and effective work environment.

Whether in uniform or not, employees are expected to present themselves in a manner that aligns with the professional standards of the healthcare industry. Dress code compliance, cleanliness, and adherence to hygiene standards contribute to the overall professional image of Nova HCS.

Employees are representatives of Nova HCS, and their conduct directly influences the perception of our organization. Your commitment to a high level of professionalism enhances our collective efforts in providing exceptional healthcare services. Any concerns or challenges related to conduct while on company business should be promptly communicated to the appropriate department for resolution.

- **Period of notice**

Employees who choose to terminate their employment with Nova HCS are encouraged to communicate their intention to leave with their immediate supervisor or the human resources department at least two weeks prior to their intended departure date. This advance notice allows the company to make necessary arrangements and plan for the effective transfer of duties, ensuring continuity in service delivery.

Nova HCS values the commitment and contributions of its employees, and the period of notice serves as an opportunity for both the departing employee and the company to part ways amicably and professionally. In certain circumstances, the company may, at its discretion, waive the notice period or negotiate an alternative arrangement based on mutual agreement.

It's essential to adhere to this notice requirement to maintain a positive and respectful work environment and to uphold the principles of professionalism and courtesy. Failure to provide the minimum two-week notice may impact the employee's standing

with Nova HCS, including eligibility for rehire and the handling of employment records.

We appreciate your cooperation in adhering to this policy, and thank you for your dedication during your tenure with Nova Healthcare Services. If you have any questions or require clarification on the notice period or related matters, please contact the human resources department for assistance.

- **Company drivers and lift requests**

Nova Healthcare Services (Nova HCS) is pleased to offer transportation assistance to our valued employees through our company drivers. It's important to note that while we strive to accommodate lift requests, this service is not always guaranteed due to various factors, including availability and scheduling constraints. When a lift is arranged, employees will be informed of a designated meeting point. It is imperative that employees arrive promptly at the specified location to receive the lift from our company drivers. Timeliness ensures a smooth and efficient transportation process, allowing for adherence to work schedules and commitments.

While accepting a lift from our company drivers, employees are responsible for their personal belongings. Nova HCS accepts no responsibility for lost or damaged items that may be left in the car. Employees are advised to check and ensure they have all their belongings with them upon exiting the vehicle.

By accepting a lift from Nova HCS, employees acknowledge and understand the conditions outlined regarding personal belongings and responsibilities. This understanding fosters a cooperative relationship between the company and its employees, ensuring a reliable and efficient transportation service.

In the event of unforeseen circumstances or changes to lift arrangements, employees are encouraged to communicate promptly with the designated contact person at Nova HCS. Clear communication allows for flexibility and the timely resolution of any transportation-related issues.

Nova HCS appreciates the cooperation of its employees in adhering to these guidelines. Our goal is to provide a supportive and efficient transportation service, and your understanding and compliance contribute to the success of this initiative. If you have any questions or concerns regarding lift requests or transportation services,

please contact the designated department for assistance. Thank you for your cooperation.

Signed by the employee

Name:

Date:

Signature:

For any questions or concerns related to this policy, please contact admin@novahc.co.uk

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Complaints and Concerns Policy

Nova Healthcare Services Ltd. (hereafter referred to as 'Nova Healthcare') is committed to providing high-quality recruitment services within the healthcare sector. This Complaints Policy outlines the procedures and guidelines for addressing and resolving any complaints or concerns raised by clients, staff, or other stakeholders regarding our services.

This policy applies to all complaints related to Nova Healthcare's recruitment services, including but not limited to client interactions, candidate placements, communication, and overall service quality. A complaint is defined as an expression of dissatisfaction with Nova Healthcare's services, operations, or conduct that requires investigation and resolution.

Nova Healthcare is dedicated to addressing complaints in a fair, timely, and confidential manner. The following steps will be followed when handling complaints:

- **Lodging a complaint**

Complaints can be submitted via email, phone, or in writing to any member of our senior staff at Nova HCS. When lodging a complaint, please provide as much detail as possible. Clearly describe the issue or concern you are raising. Identify individuals,

departments, or teams involved in the incident or situation. Provide specific dates or a timeframe during which the incident occurred. Include any supporting documentation, records, emails, or other relevant materials that can help us understand and address the complaint accurately.

- **Email:** admin@novahc.co.uk Please ensure to include 'Complaint' in the subject line for prompt attention.
- **Phone:** Complainants can contact us at 0701057551 to verbally lodge their complaint during our business hours, 9 am to 6 pm, weekdays only.
- **In Writing:** Complaints can also be submitted in writing and addressed to any member of our senior staff at Nova HCS. Written complaints should be addressed to:

- **Initial Assessment**

The senior staff member responsible for complaints handling will promptly acknowledge the receipt of your complaint within 24 hours of receiving it. This initial acknowledgment is to confirm that your concerns have been received and are being taken seriously.

Subsequently, the senior staff member will undertake a meticulous review of the complaint. This comprehensive review is designed to fully comprehend the issues presented in your complaint and to ascertain the most suitable course of action moving forward. During this review, the senior staff member will pay careful attention to the details you've provided, assessing all relevant parties, dates, and circumstances.

As part of this process, the senior staff member will be actively engaged in gathering any additional details and information that can contribute to a clearer understanding of the situation. Your cooperation in providing further insights or supporting evidence, if available, will aid us in conducting a more accurate and efficient investigation.

- **Investigation**

An impartial investigation will be conducted to gather all relevant information and details surrounding the complaint. Interviews with involved parties, collection of evidence, and assessment of records may be carried out.

- **Resolution**

Upon completion of the investigation, Nova Healthcare will provide a written response to the complainant within 10 working days from the receipt of the complaint. This may be via email, text, or post. The response will outline the findings, any actions taken or proposed, and steps to prevent similar issues in the future.

- **Escalation**

If the complainant remains dissatisfied with the resolution, they can request an escalation of the complaint to a higher authority within Nova Healthcare. This will typically be one of the directors and founders of Nova HCS.

- **Confidentiality and Whistleblower Protection**

All complaints will be treated with the utmost confidentiality and handled in compliance with the General Data Protection Regulation (GDPR) and applicable data protection laws. Information related to complaints will be disclosed only to individuals directly involved in the resolution process and those necessary for conducting a thorough investigation.

Nova Healthcare recognizes the importance of whistleblower protection and is committed to safeguarding individuals who raise concerns in good faith. We strictly prohibit any form of retaliation, harassment, or adverse treatment against complainants who come forward with complaints or concerns.

Retaliation includes but is not limited to threats, discrimination, demotion, salary reduction, or termination of employment.

Nova Healthcare is dedicated to creating a supportive environment where individuals can express their concerns without fear of reprisal. Any form of retaliation against a complainant will be promptly investigated, and appropriate disciplinary action will be taken against those found responsible.

- **Reporting misconduct or concerns**

In addition to formal complaints, Nova Healthcare encourages employees, candidates, and clients to report any suspected misconduct, ethical concerns, or violations of policies. Reports can be made anonymously through a designated channel to protect the person's identity.

- **Reviews and amendments**

This Complaints Policy will be periodically reviewed annually and updated as necessary to ensure its effectiveness and compliance with any changes in regulations or best practices. Nova Healthcare will use the information gathered from complaints to identify trends, areas for improvement, and training needs to enhance its services where applicable.

For any questions or concerns related to this policy, please contact admin@novahc.co.uk

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GDPR Policy

Nova Healthcare Services Ltd is required to take a proportionate and appropriate approach to UK GDPR compliance. Nova Healthcare Services Ltd understands that not all organizations will need to take the same steps – it will depend on the volume and types of personal data processed by a particular organization, as well as the processes already in place to protect personal data.

Nova Healthcare Services Ltd understands that if significant volumes of personal data are processed, including **special categories of personal data**, or it has unusual or complicated processes in place in terms of the way personal data is handled, Nova Healthcare Services Ltd will consider obtaining legal advice specific to the processing conducted and the steps that may need to be taken.

UK GDPR does not apply to any personal data held about someone who has died. Both the Access to Medical Reports Act 1988 and the Access to Health Records 1990 will continue to apply.

- **Process for Promoting Compliance at Nova Healthcare Services Ltd**

Nova Healthcare Services Ltd recognizes that, in addition to complying with the key principles, it must be able to provide documentation to the Information Commissioner's Office (ICO) on request, as evidence of compliance. Nova Healthcare Services Ltd understands that a 'privacy by design' approach must be adopted. This means that data protection issues should be considered at the very start of a project,

or engagement with a new Service User. Data protection should not be an afterthought. These ideas are also covered in more detail in the Key Principles Guidance.

- **Processing Personal Data**

The provision of health or social care or treatment or the management of health or social care systems and services is expressly referred to in UK GDPR as a lawful basis upon which an organization is entitled to process special categories of data.

In terms of other types of personal data, Nova Healthcare Services Ltd must only process personal data if it is able to rely on one of several grounds set out in the UK GDPR. The grounds which are most commonly relied on are: Processing Personal Data.

- The data subject has given their consent to the organization using and processing their personal data.
- The organization is required to process the personal data to perform a contract with the data subject and.
- The processing is carried out in the legitimate interests of the organization processing the data – note that this ground does not apply to public authorities.

The other grounds which may apply are:

- The processing is necessary to comply with a legal obligation.
- The processing is necessary to protect the vital interests of the data subject or another person.
- The processing is necessary to perform a task carried out in the public interest.

- **Data Protection Officers**

Nova Healthcare Services Ltd understands that some organizations will need to appoint a formal Data Protection Officer under UK GDPR (a “**DPO**”). The DPO benefits from enhanced employment rights and must meet certain criteria, so it is recognized that it is important to know whether

Nova Healthcare Services Ltd requires a DPO. This requirement is outlined in the Appointing a Data Protection Officer Policy and Procedure. Nova Healthcare Services has appointed a singular person, Nikki Virk, as our formal Data Protection Officer to

have overall responsibility for the management of personal data and compliance with UK GDPR.

- **Data Security and Retention**

Two of the key principles of UK GDPR are data retention and data security.

- Data retention refers to the period for which Nova Healthcare Services Ltd keeps the personal data that has been provided by a data subject. At a high level, Nova Healthcare Services Ltd must only keep personal data for as long as it needs the personal data.
- Data security requires Nova Healthcare Services Ltd to put in place appropriate measures to keep data secure.

- **Subject Access Requests**

One of the key rights of a data subject is to request access to and copies of, the personal data held about them by an organization. Where Nova Healthcare Services Ltd receives a subject access request, it understands that it will need to respond to the Subject Access Request following the requirements of UK GDPR. To help staff at Nova Healthcare Services Ltd understand what subject access requests are and how they should deal with a subject access request, a Subject Access Request Policy and Procedure is available to staff.

- **The Rights of a Data Subject**

In addition to the right to place a subject access request, data subjects benefit from several other rights, including the right to be forgotten, the right to object to certain types of processing, and the right to request that their personal data be corrected by Nova Healthcare Services Ltd. Not all rights apply in all circumstances. The rights of the data subject are covered in detail in the corresponding guidance.

- **Breach Notification Under UK GDPR**

In certain circumstances, if there is a personal data breach (i.e., a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data), the ICO must be notified and potentially any affected data subjects. There are strict timescales in place for making such The processing is necessary to comply with a legal obligation The processing is necessary to protect the vital interests of the data subject or another person The processing is necessary to perform a task carried out the public interest Data retention refers to the period for which Nova Healthcare Services Ltd keeps the personal data that has been

provided by a data subject. At a high level, Nova Healthcare Services Ltd must only keep personal data for as long as it needs the personal data. Data security requires Nova Healthcare Services Ltd to put in place appropriate measures to keep data secure and notifications. Nova Healthcare Services Ltd understands that this requirement is likely to have less impact on NHS organizations that are already used to reporting using the NHS reporting tool.

- **Data Privacy and Consent Form**

Organizations are required to provide data subjects with certain information about how their personal data is being processed. The easiest way to provide that information is in a data privacy policy. A privacy policy template is available for Nova Healthcare Services Ltd to use and adapt on a case-by-case basis.

The privacy policy sits alongside a consent form which can be used to ensure that Nova Healthcare Services Ltd obtains appropriate consent, particularly from the Service User, to the various ways in which Nova Healthcare Services Ltd uses the personal data (where Nova Healthcare Services Ltd needs to rely on consent as a basis for the processing). The Consent Form contains advice and additional steps to take if the Service User is a child or lacks capacity.

- **Transfer of Data**

If Nova Healthcare Services Ltd wishes to transfer personal data to a third party, an agreement must be set out on how the third party will use the personal data. If the third party is processing data on the instructions of Nova Healthcare Services Ltd, the contract must cover specific points set out in the UK GDPR. Nova Healthcare Services Ltd must consider carrying out due diligence investigations on third-party recipients of personal data, of which Nova Healthcare Services Ltd is the controller.

Transfers of personal data outside of the UK and EEA (and other countries with an adequacy decision in place for such data transfers) may only be made under specific circumstances. This includes where a data processor processes personal data in such a jurisdiction. For such transfers, Nova Healthcare Services Ltd recognizes that further protection will need to be put in place and other aspects considered before the transfer takes place.

- **Data Protection Impact Assessments**

Nova Healthcare Services Ltd carries out Data Protection Impact Assessments each time it processes personal data in a way that presents a “high risk” for the data subject. Examples of when a Data Protection Impact Assessment should be

conducted are provided in the relevant policy and procedure. Given the volume of special categories of data that are frequently processed by organizations in the health and care sector, there are likely to be several scenarios that require a Data Protection Impact Assessment to be completed.

- **Compliance with UK GDPR**

Nova Healthcare Services Ltd understands that there are two primary reasons to ensure that compliance with UK GDPR is achieved:

It promotes high standards of practice and Care and provides significant benefits for staff and, in particular, Service Users.

Nova Healthcare Services Ltd appreciates that it is important to remember, however, that the ICO intends to educate and advise, not to punish. The ICO wants organizations to achieve compliance and offers guidance to organizations about how to comply. A one-off, minor breach may not attract the attention of the ICO, but Nova Healthcare Services Ltd persistently breaches UK GDPR or commits significant one-off breaches (such as the loss of a large volume of personal data, or the loss of special category personal data), it may be subject to ICO enforcement action. In addition to imposing fines, the ICO also has the power to conduct audits of Nova Healthcare Services Ltd and its data protection policies and processes and to issue instructions for Nova Healthcare Services Ltd to comply or outright data processing practices including requiring Nova Healthcare Services Ltd to stop providing services or to notify data subjects of the breach, delete certain personal data held or prohibit certain types of processing.

For any questions or concerns related to this policy, please contact admin@novahc.co.uk

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Health and Safety Policy

Nova Healthcare Services Ltd, as an employer, is committed to ensuring the health, safety, and welfare of its employees, so far as is reasonably practicable. We also fully accept our responsibility for other persons who may be affected by our activities, and we will take steps to ensure that our statutory duties are met at all times. Nova Healthcare

Services Ltd expects all staff, visitors, contractors, and other employers who work at Nova Healthcare Services Ltd to share this commitment by complying with the policies and procedures at Nova Healthcare Services Ltd and to understand that they too have legal and moral obligations to themselves and one another.

Nova Healthcare Services Ltd acknowledges and accepts the responsibilities placed on it as an 'Employer' by the Health and Safety at Work etc. Act 1974 and other relevant legislation, Nova Healthcare Services Ltd considers that a safe and healthy working environment is a prerequisite to achieving safe, high-quality Care and a safe working environment for our staff and those who work on our behalf.

Nova Healthcare Services Ltd will provide and maintain a healthy and safe working environment to minimize the number of instances of occupational accidents, incidents, illnesses, and near misses. Through the implementation of the Health and Safety Policy and Procedure, Nova Healthcare Services Ltd is committed to the following objectives:

- To provide, as far as reasonably practicable, a safe and healthy working environment, safe premises, and facilities for staff, Service Users, contractors, and others who work on our behalf.
- Maintaining the workplace in a safe condition and providing adequate facilities and arrangements for welfare at work.
- The provision and maintenance of equipment and systems of work that are safe.
- Arrangements for ensuring safety in connection with the use, handling, storage, and transport of articles and substances are in place.
- Providing information, instructions, training, and supervision as necessary to ensure the health and safety at work of its employees and other persons.
- Health and safety policies, standards, and management systems (including procedures and work instructions) will be defined, documented, implemented, and maintained.
- Creating for staff, as far as is practicable, a working environment where potential work-related stressors are avoided, minimized, or mitigated through good management practices, effective human resources policies, and staff development.
- Ensuring, as far as reasonably practicable, that risks associated with travel by staff for Nova Healthcare Services Ltd are appropriately managed.
- Making sure that all staff are aware of their health and safety responsibilities and know what is expected of them and what they must do to discharge the responsibilities assigned to them.

- Providing access to staff to appropriate training and development to enable them to discharge competently the responsibilities assigned to them.
- Having an effective system for communicating and consulting on health and safety matters and securing the cooperation of staff, Service Users, and commissioners implementing the Health and Safety Policy and Procedure.
- To have in place arrangements to plan, implement, monitor, and review measures to address risks arising from activities at Nova Healthcare Services Ltd.
- To strive to improve continuously the health and safety performance of Nova Healthcare Services Ltd.
- Appointing a competent person to support Nova Healthcare Services Ltd in meeting our statutory duties.

Nova Healthcare Services Ltd will undertake to continually review and develop our safety management systems, with the overarching aim of conducting our activities in a manner that does not affect the health and safety of any staff, contractors, visitors, or members of the public.

The other members of Nova Healthcare Services Ltd and I are committed to this policy and the implementation and maintenance of the highest standards of health, safety, and welfare within Nova. We expect every member of Nova Healthcare to share this commitment and to work to achieve it.

For any questions or concerns related to this policy, please contact admin@novahc.co.uk

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Modern Slavery Policy

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 Act and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulation 2015 (the “Act”). It sets out the steps taken by Nova Healthcare Services Ltd. to prevent modern slavery and human trafficking in its business and supply chain.

Nova HCS fully supports the Government’s objectives to eradicate modern slavery and human trafficking and recognizes the significant role we can play in combating it and

supporting victims. In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labor standards abuses.

We recognise that, being in the healthcare industry, we are exposed to risks relating to the potential violation of human rights in areas including modern slavery and human trafficking. We are conscious that such risks can arise in certain areas of the sector, particularly nursing, aged care provision, and the manufacturing of healthcare equipment. We are committed to monitoring such risks in our business and our wider supply chain and to mitigating them.

Steps taken to date include:

→ People

We promote a workplace environment that is fair, open, and respectful, and one that protects the rights and dignity of all employees. We operate people practices, employment contracts, and collective agreements that are lawful and aligned with our code and values.

- We confirm the identities of all new employees, temporary workers, and contractors and their right to work in the United Kingdom, and pay all our employees above the National Living Wage
 - Our complaints and concerns policy additionally gives a platform for our employees to raise concerns about poor working practices.

→ Whistleblowing

Our whistleblowing policy sets out our commitment to ensure people are free to question things and raise anything they are concerned about, specifically modern slavery and human trafficking. We encourage people to speak up by raising matters with our senior office team or speaking personally with the directors.

→ Procurement and our supply chain

- Our current due diligence process includes a modern slavery assessment.
- When procuring goods and services, we additionally apply specific Terms and Conditions that require suppliers to comply with relevant legislation.

→ Review of effectiveness

We intend to take further steps to identify, assess, and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in our supply chains.

→ Our anti-slavery program will also

- Continue to support all staff to understand and respond to modern slavery and human trafficking and the impact that each and every individual working in the healthcare sector can have in keeping present and potential future victims of modern slavery and human trafficking safe.
- Ensure that staff have access to training on how to identify those who are victims of modern slavery and human trafficking. This training will include the latest information and will help staff develop the skills to support individuals who come into contact with health services, which is to be regularly redone to ensure staff are consistently up-to-date.
- Review our safeguarding policies and training programs to ensure that Modern Slavery and human trafficking reflect potential requirements in pending reforms relating to the pre-criminal needs of people involved in human trafficking and modern slavery.
- Undertake a risk assessment on transparency in the supply chain, including an overview of products, services, and suppliers procured.

For any questions or concerns related to this policy, please contact admin@novahc.co.uk

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Whistleblowers Protection Policy

The purpose of this policy, as per Nova Healthcare's intent, is to ensure the reporting and proper handling of any fraudulent, misconduct, or inappropriate activities conducted by our colleagues. This policy delineates the procedures for individuals to express their concerns and the subsequent actions to address them. Nova Healthcare strongly encourages all individuals to voice their concerns regarding the conduct of others within the organization or the operational aspects of the business.

It's important to note that this policy applies to all Nova Healthcare employees, though it does not constitute an inherent part of their employment terms and conditions. Additionally, Nova Healthcare retains the discretion to amend, remove, or replace this policy as deemed necessary. The company also reserves the right to make exceptions to this policy in specific circumstances while adhering to UK legislation and best practice guidelines.

- **Background**

The law protects workers who raise legitimate concerns about specified matters. These are called “qualifying disclosures”. A qualifying disclosure is one made in the public interest by a colleague who has a reasonable belief that one of the following is being, has been, or is likely to be committed:

- Criminal activity, including fraud or theft;
- A miscarriage of justice; bribery or corruption (e.g., accepting incentives in return for giving business, or receiving benefits);
- An act creating a risk to health and safety;
- An act causing damage to the environment;
- A breach of any other legal obligation or regulatory requirement; or
- Deliberate concealment of information relating to any of the above;

It is not necessary for the colleague to have proof that such an act is being, has been, or is likely to be, committed — a reasonable belief is sufficient. The colleague has no responsibility for investigating the matter — it is the company's responsibility to ensure that an investigation takes place.

A colleague who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimized because they have made such a disclosure.

The company encourages colleagues to raise their concerns under this procedure in the first instance. If a colleague is trying to decide whether or not to raise a concern, they should discuss the issue with their line manager, HR, or senior management.

- **Principles**

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Colleagues should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

Any matter raised under this procedure will be investigated thoroughly, promptly, and confidentially, and the outcome of the investigation will be reported back to the colleague who raised the issue.

No colleague will be victimized for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the colleague will not be prejudiced because he/she has raised a legitimate concern.

Victimization of a colleague for raising a qualified disclosure will be a disciplinary offense.

If misconduct is discovered as a result of any investigation under this procedure, the company's disciplinary procedure will be used, in addition to any appropriate external measures.

Maliciously making a false allegation is a disciplinary offense and will be regarded as gross misconduct.

An instruction to cover up wrongdoing is itself a disciplinary offense. I was told not to raise or pursue any concern, even by a person in authority, such as a manager, colleagues should not agree to remain silent. They should report the matter to their line manager, HR, or senior management.

Where requested and as far as possible, the company will keep the identity of the colleague making the disclosure confidential. However, in certain circumstances, e.g., if a criminal investigation follows, the colleague may be needed as a witness. If this happens, the person carrying out the investigation will inform the colleague at the earliest convenience.

This procedure is for disclosures about matters other than a breach of a colleague's own contract of employment. If a colleague is concerned that their own contract has been or is likely to be broken, they should use the company's grievance procedure.

- **Procedure**

In the first instance, and unless the colleague reasonably believes their line manager to be involved in the wrongdoing, or if for any other reason, the colleague does not wish to approach their line manager, any concerns should be raised with the colleague's line manager. If they believe the line manager to be involved, or for any

reason do not wish to approach the line manager, then the colleague should proceed straight to Stage 3.

The line manager will alert senior management, who will arrange an investigation into the matter.

- The investigation may involve the colleague and other individuals involved in giving a written statement.
- The colleague's statement will be taken into account, and they will be asked to comment on any additional evidence obtained.
- The line manager(or the person who carried out the investigation) will report to the Board, which will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency.
- If disciplinary action is required, the line manager(or the person who carried out the investigation) will advise senior management and start the disciplinary procedure.
- At the conclusion of any investigation, the colleague will be told the outcome, where reasonably practicable, and what the board has done or proposes to do about it. If no action is to be taken, the reason for this will be explained.

If the colleague is concerned that their line manager is involved in wrongdoing, has failed to make a proper investigation, or has failed to report the outcome of the investigation to the board, they should inform senior management of the company. They will arrange for another manager to review the investigation carried out, make any necessary further inquiries, and make their own report to the board as in Stage 2 above.

If for any other reason, the colleague does not wish to approach their manager, they should, in the first instance, contact senior management. Any approach to senior management will be treated with the strictest confidence, and the colleague's identity will not be disclosed without their prior consent.

If at the conclusion of stages 1, 2, and 3, the colleague reasonably believes that the appropriate action has not been taken, they should report the matter to the proper

authority. The legislation sets out several bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs
- Financial Conduct Authority (formerly the Financial Services Authority)
- Competition and Markets Authority
- Health and Safety Executive
- Environment Agency
- Independent Police Complaints Commission
- Serious Fraud Office

For any questions or concerns related to this policy, please contact admin@novahc.co.uk

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Equality and Diversity Policy

Nova Healthcare Services Ltd. is committed to being an equal opportunity and diverse organization. All matters related to employment with the company are decided on the basis of qualifications, merit, and business needs. The company will not tolerate discrimination on the basis of race, religion or belief, gender, sexual orientation, disability, marital or civil partnership status, gender reassignment, age, pregnancy and maternity, Trade Union membership, ethnic or national origin, or because they are a part-time worker or a full-time employee.

This policy applies to all Nova HCS colleagues, as well as clients, job applications, students, and suppliers. It does not form part of a colleague's terms and conditions of employment and may be varied, withdrawn, or replaced by the company at any time. The company reserves the right to depart from the policy in appropriate circumstances, in line with UK legislation and best practice guidelines.

The purpose of this policy is to set out the steps which the company takes, and which it requires its colleagues to take, to prevent discrimination and to promote fair and unbiased behaviors.

- **Principles**

- Nova HCS aims to create a respectful and dignified environment for its colleagues and associated workers. Any disrespectful behavior that causes distress will be subject to disciplinary action.
- We will not tolerate discrimination on the grounds of race, religion or belief, gender, sexual orientation, disability, marital or civil partnership status, gender reassignment, age or pregnancy and maternity, Trade Union membership, color, ethnic or national origin, or because they are a part-time worker or a full-time colleague.
- Any colleague who is found to discriminate on any of the above grounds will be subject to disciplinary action according to the organization's disciplinary procedure. In serious cases, such behavior will be deemed to constitute gross misconduct.
- Any colleague may use the grievance procedure to complain about discriminatory conduct or victimization. No individual will be penalized for raising such a grievance unless it is made from malice, in which case the disciplinary procedure may be invoked.

- **Forms Of Discrimination**

- Direct Discrimination — consists of treating a person less favorably on the grounds of age, disability, ethnic origin, gender, marital status, nationality, religious belief, or sexual orientation, than others are or would be treated in the same or similar circumstances (for example, rejecting a job applicant on the grounds that, due to their race, they will not “fit in”).
- Indirect Discrimination — consists of applying a requirement or condition that, although applied equally to all individuals, is such that a considerably smaller proportion of individuals of a particular group can comply with it, and it cannot be shown to be justified on other grounds.
- Associative Discrimination — whereby someone experiences direct discrimination because they are associated with another person with a protected characteristic, even though they themselves do not hold that characteristic.
- Perception Discrimination — whereby direct discrimination occurs against an individual based on the perception that they have a particular protected characteristic, even if they do not.
- Harassment occurs when there is unwanted conduct, related to one of the protected characteristics, that has the purpose or effect of either violating one's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive

environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

- Third-Party Harassment — is when a colleague complains of harassment by a third party (customer or client) who is not an employee of the company.
- Victimization — consists of giving a person less favorable treatment than others in the same circumstances because of their personal circumstances; it is suspected or known that they have brought proceedings under legislation relating to discrimination; they have given evidence or information relating to such proceedings; or they have alleged that discrimination has occurred.

- **Responsibility**

It is the responsibility of everyone to act in a way that upholds the equality and diversity policy and to challenge or report non-compliance. All managers must be aware of the behaviors of their team and are responsible for ensuring that their team members act in a non-discriminatory manner. All managers and supervisors, particularly those who are responsible for selecting training or allocating work, must lead by example and ensure that no discrimination takes place, either directly or indirectly.

- **Recruitment And Selection**

- The company will not use recruitment methods that exclude or disproportionately reduce the numbers of applicants of any of the groups mentioned within the principles section of this policy.
- Recruitment methods may vary according to the needs of the role and the required level of response, but predominantly, the company will use job boards and employee referral schemes.
- Job titles and job content will be presented without bias toward gender or race.
- All applications will be given equal consideration based on job-specific criteria.
- All applicants for the same job will be subject to the same process and aptitude tests. Adjustments will be made if necessary for applicants to complete these.
- Only those qualifications and skills that are applicable to the job will be used as criteria for selection. They may include educational and professional qualifications (or international equivalents), necessary experience (as long as it does not exclude candidates of certain age groups), the ability to conduct business in reasonable English, and physical abilities.
- All requirements for educational and professional qualifications will be valid and job-related, and overseas degrees and diplomas are deemed equivalent to the UK qualifications.

- **Terms of Appointment**

Salaries will be reviewed annually to ensure that there is equal pay for equal work or work of equal value. Salary increases will be made on the ability and value of the work to the company, and the same rules followed in all cases. The annual salary review under this policy will not always result in a salary increase — the purpose of this review is to ensure parity.

- **Duration of Employment**

It is the company's aim to comply with eliminate discrimination in the field of employment against disabled persons or persons who have had a disability. Where any existing colleague or job applicant has a disability or would be at a substantial disadvantage in performing the relevant job because of the working arrangements or physical environment, the company will consider making reasonable adjustments to the working arrangements. Various factors, including practicality and costs, will be considered. Such adjustments might include:

- Making reasonable adjustments to premises.
- Allocating some of the disabled person's duties to another person.
- Transferring the disabled employee to fill an existing vacancy.
- Altering the employee's working hours.
- Assigning the employee to a different place of work.
- Allowing absence during working hours for rehabilitation, assessment, or treatment.
- Giving training.
- Acquiring or modifying equipment.
- Modifying instructions or reference manuals.
- Modifying procedures for testing or assessment.

Where reasonably practicable, such adjustments will be made. However, there may be circumstances where it would not be reasonably practicable to accommodate changes and where less favorable treatment may be justified in accordance with the statutory provisions.

The company will ensure that persons in part-time employment are treated no less favorably than persons in full-time employment.

- **Training And Development**

- Training opportunities will be made available to all colleagues.

- Part-time employees will have the same opportunities as full-time colleagues.
- Fixed-term colleagues will have the same opportunities as permanent colleagues.
- Assistance with further education may be provided to colleagues, where a course can be shown to be of benefit to the company as well as to the individual, and within the training budget.
- Training courses and materials will be free from bias or prejudice.
- Performance appraisals will use objective criteria that are neither directly nor indirectly discriminatory.
- The company will have regular performance reviews and informal meetings to identify individuals who may be under-utilizing their skills and qualifications, identify training needs, and develop their potential regardless of operating level.
- Selection of colleagues for promotion is based on ability and merit, and criteria such as total length of service, which may be indirectly discriminatory, will be avoided.

- **Monitoring**

For the purpose of equality and diversity monitoring, the company will maintain information relating to colleagues' age, disability, ethnic origin, gender, and nationality. This information will be used solely for monitoring purposes and kept confidential, and access to these records will be restricted.

Recruitment records, including information on decisions in respect of short-listing and appointments, are kept in sufficient detail to enable the company to ensure that its equality and diversity policy is being properly implemented in the area of recruitment.

- **Termination of Employment**

The company will monitor redundancy criteria and procedures to ensure that they are fair and objective and do not directly or indirectly discriminate against colleagues. The company will ensure that disciplinary procedures are carried out fairly and uniformly for all colleagues, whether they result in the giving of disciplinary warnings or some other sanction.

- **Breaches of This Policy**

- If a colleague believes that they have been discriminated against on any of the grounds given, they should raise the matter through the company's complaints and concerns policy.
- Should a colleague believe that they have been victimized or harassed on any of the above grounds, they are encouraged to raise the matter through the company's whistleblower protection policy.

- Colleagues who raise an issue under this policy in good faith will not be treated less favorably as a result. Any allegation which has been made in bad faith, however, will be dealt with under the company's disciplinary policy.
- Any colleague found to have been in breach of this policy will be dealt with under the disciplinary policy. In serious cases, such behavior may amount to gross misconduct and lead to summary dismissal.

For any questions or concerns related to this policy, please contact admin@novahc.co.uk

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Mobile Phone Policy

At Nova Healthcare Services (Nova HCS), we prioritize the safety, focus, and professionalism of our agency workers during work hours. To ensure an environment conducive to delivering exceptional healthcare services, we maintain a zero mobile phone policy.

1. Prohibited Use

Agency workers are prohibited from using personal mobile phones while on duty, except during designated lunch breaks. This includes making or receiving calls, sending or reading text messages, browsing the internet, or engaging in any form of non-work-related communication.

2. Safety Concerns

The use of mobile phones poses a potential distraction that may compromise patient care, employee safety, and overall workplace productivity. To mitigate these risks, we enforce strict adherence to this policy.

3. Emergency Situations

In the event of a genuine emergency that requires immediate attention, agency workers may discreetly use their mobile phones to address the situation. However, such instances should be kept to a minimum and communicated to the appropriate supervisor or manager as soon as possible.

4. Lunch Break Exception

During designated lunch breaks, agency workers are permitted to use their mobile phones for personal communication or entertainment. However, it is expected that such usage does not interfere with the timely return to work responsibilities.

Failure to adhere to the zero mobile phone policy may result in disciplinary action, up to and including termination of employment. We emphasize the importance of compliance with this policy to maintain a professional and focused work environment.

For any questions or concerns related to this policy, please contact admin@novahc.co.uk

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Drugs and Alcohol Policy

Nova Healthcare Services (Nova HCS) is committed to maintaining a safe, healthy, and productive work environment for all employees. As part of this commitment, we enforce a strict zero-tolerance policy for the use or possession of drugs and alcohol in the workplace. Any employee found to be under the influence of drugs or alcohol while on duty will face immediate termination of employment.

1. Prohibited Substances

The use, possession, distribution, or sale of illegal drugs or unauthorized substances is strictly prohibited on Nova HCS premises or while conducting company business. This includes but is not limited to controlled substances, narcotics, and recreational drugs.

2. Alcohol Consumption

Consumption of alcohol during work hours, including breaks, is strictly prohibited. Employees are expected to report to work free from the influence of alcohol and to refrain from consuming alcohol while on duty.

3. Impairment

Employees are expected to perform their duties in a safe and responsible manner. Any indication of impairment due to drugs or alcohol, including slurred speech, impaired coordination, or erratic behavior, will be treated as a violation of this policy.

4. Drug and Alcohol Testing

Nova HCS reserves the right to conduct drug and alcohol testing as deemed necessary, including pre employment screening, random testing, and testing based on reasonable suspicion. Refusal to comply with drug and alcohol testing procedures may result in disciplinary action, up to and including termination of employment.

- **Non-Compliance**

Employees found to be in violation of this zero-tolerance policy will face immediate termination of employment. Nova HCS is committed to providing a safe and drug-free workplace for all employees and will take decisive action to address any violations of this policy.

- **Support and Resources**

Nova HCS recognizes that substance abuse may be a complex issue requiring support and assistance. Employees struggling with substance abuse are encouraged to seek help through available resources, such as employee assistance programs (EAPs), counseling services, or community-based support groups.

- **Confidentiality**

All matters related to drug and alcohol use will be handled with the utmost confidentiality and sensitivity. Information obtained through drug and alcohol testing reports of suspected substance abuse will be treated with discretion and respect for the privacy of the individuals involved.

Nova HCS appreciates the cooperation of all employees in maintaining a safe and drug-free workplace. Your adherence to this zero-tolerance policy is essential to ensuring the well-being and safety of everyone in our organization. If you have any questions or concerns regarding this policy, please contact the human resources department for assistance.

For any questions or concerns related to this policy, please contact admin@novahc.co.uk

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Nikki Virk.
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Nova Healthcare Services Ltd.