



NOVA
HEALTHCARE
SERVICES

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, 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 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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Nova Healthcare Services Ltd.