



Holden Knight Healthcare Ltd

Whistleblowing Policy

Human Resources v1.2 November 2026

Review Date: November 2026



Whistleblowing Policy and Procedure

1. Introduction

- 1.1 Holden Knight is committed to conducting its business with honesty and integrity and we expect all staff to maintain high standards. However, all organisations 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 occur.
- 1.2 Especially in light of the nature of our business, all our staff have a legal and moral responsibility to report improper acts and omissions. In some circumstances, failure to raise such concerns may amount to breach of contract or even breaking the law and may leave the employee subject to disciplinary action for failing to pass on concerns.
- 1.3 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.
 - To provide staff with guidance as to how to raise those concerns.
 - To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.4 This policy covers all employees, contractors, casual workers and agency workers. This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. What is Whistleblowing?

- 2.1 Whistleblowing is the disclosure of information by a member of staff, which relates to some danger, fraud or other illegal or unethical conduct in the workplace. The Employment Rights Act 1996 governs workplace activities and is intended to protect staff that blow the whistle on bad practice from being subjected to any detriment or unfairly dismissed as a result.

2.2 Qualifying Disclosures

Certain disclosures are prescribed by law as 'qualifying disclosures'. Disclosures are qualifying disclosures where it can be shown that the Company has committed a 'relevant failure' by:-

- Criminal activity;
- Miscarriages of justice;
- Danger to health and safety;
- Damage to the environment;
- Failure to comply with any legal or professional obligation or regulatory requirements;
- Bribery;
- Financial fraud or mismanagement;
- Negligence;
- Breach of our internal policies and procedures;
- Conduct likely to damage our reputation or financial wellbeing;
- Unauthorised disclosure of confidential information;
- Negligence;
- The deliberate concealment of any of the above matters.

2.3 These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen.

2.4 A whistle-blower is a person who raises a genuine concern relating to any of the above. If you have any concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

3. The Procedure

3.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any workplace wrongdoing. This policy should not be used for complaints of your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Policy and Procedure or Anti-harassment and Bullying Procedure as appropriate to report your concerns.

3.2 If you are uncertain whether something is within the scope of this policy you should seek advice from a senior manager or Human Resources.

3.3 You can raise your concerns orally or in writing to your manager. You must state that you are using the 'Whistleblowing' policy and specify whether you wish your identity to be kept confidential. You will be asked to formalise your concerns in writing either before or after the first meeting. Your Manager will acknowledge receipt of your formal written disclosure and keep a record of further action taken. We will also aim to give you an indication of how we propose to deal with the matter.

3.4 You are entitled to be accompanied by a colleague or accredited trade union representative at any meeting with your Manager under this policy. Your companion will be asked to respect the confidentiality of your disclosure and any subsequent investigation.

3.5 Where the matter is more serious, or you feel that your Manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should address your concerns to the Operations Manager, Head of Human Resources or the Compliance Team.

3.6 The Company recognises that disclosures made under this policy may involve highly confidential and sensitive matters and that you may prefer to make an anonymous disclosure. However, the Company regrets that it cannot guarantee to investigate all anonymous allegations. Proper investigation may prove impossible if the investigator cannot obtain further information from you or give you feedback. It is therefore preferable for whistle-blowers to reveal their identity and measures can be taken to preserve confidentiality if appropriate.

4. Investigation and Outcome

4.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

4.2 In some cases we may appoint an investigator who may make recommendations for change to enable us to minimise the risk of future wrongdoing. We will keep you informed of the progress of the investigation and its likely timescale and you should treat any information about the investigation as confidential.

4.3 If we conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, he or she will be subject to disciplinary action.

4.4 Whilst we are unable to guarantee the outcome you are seeking; we will try to deal with your concern fairly and appropriately. If you are not happy with the way in which your concern has been handled, you can raise it with the Quality and Compliance team.

4.5 It is understandable that whistle-blowers are sometimes worried about possible repercussions, and we aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

5. Anonymous Allegations

5.1 This Procedure encourages staff to put their name to an allegation whenever possible. Concerns expressed anonymously are much harder to investigate but will be considered at the discretion of the Company.

5.2 In exercising this discretion, the factors to be taken into account would include:

- The seriousness of the issues raised
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources

5.3 Staff must not suffer any detrimental treatment as a result of raising a concern, and this includes dismissal, disciplinary action, threats or other unfavourable treatment. If you suffer any such treatment you should inform your Manager, Service Manager (or Head of HR) immediately. If the matter is not remedied you should raise it formally under our Grievance Policy and Procedure.

5.4 Staff must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct you may be subject to disciplinary action and in some cases the whistle-blower could have a right to sue you personally for compensation in an employment tribunal.

6. External Disclosures

6.1 In most cases you should not find it necessary to alert anyone externally. However, the law recognises that in some circumstances it may be appropriate to report your concerns to an external body. It will rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external.

6.2 The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline and also has a list of prescribed regulators for reporting certain types of concern, for example the Health and Safety Executive, Environment Agency etc. Public Concern at Work can be contacted by telephone on 020 7404 6609, or by e-mail whistle@pcaw.co.uk. Further information can also be found on their website – www.pcaw.co.uk.

6.3 Whistleblowing concerns usually relate to the conduct of our staff but they may sometimes relate to the actions of a third party, such as a customer or supplier. In such circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally in the first instance.