WHISTLEBLOWER PROTECTION POLICY AND PROCEDURE

PRIMUS PLUS HEALTHCARE

CONTACT DETAILS

Main Office Address: 603 London Road, Westcliff on Sea, Southend on Sea, Essex, SS0 9PE

Bradford Address: 1436 Leeds Road, Bradford, BD3 7AA

Phone: 01702963009

Email: care@primusplus.co.uk

REGISTERED MANAGER/ PERSON IN CHARGE

Jonas Ayitevie

Date Created: April, 2026

Next Review Date: April, 2027

Signed By: Jonas Ayitevie

1.0 PURPOSE

The Whistleblower Protection Policy and Procedure of Primus PLUS Healthcare ensures that employees, contractors, and stakeholders have a secure means of reporting concerns regarding misconduct, unethical practices, or illegal activities. It reflects our commitment to ethical standards, legal compliance, and creating a safe working environment. This policy applies across our Supported Living without Personal Care services, which include caring for adults over 65, those with dementia, mental health issues, physical disabilities, autism, learning disabilities, and people with eating disorders or those who misuse drugs or alcohol.

1.1 Ensure Protection

This policy safeguards whistleblowers from retaliation, victimization, or discrimination when reporting concerns in good faith. Retaliation may include dismissal, demotion, harassment, or exclusion from opportunities. Primus PLUS Healthcare is committed to upholding the rights of whistleblowers and will act if retaliation occurs, ensuring a safe reporting environment in our care settings.

1.2 Promote Accountability

We encourage a culture of transparency and accountability by ensuring that concerns are raised, addressed, and resolved promptly. This policy ensures that:

- Primus PLUS Healthcare adheres to legal and ethical obligations.
- Corrective actions are taken to improve processes and prevent future misconduct.
- We demonstrate commitment to ethical practices in our relationships with healthcare providers and regulatory bodies.

1.3 Comply with Legal Requirements

The policy ensures compliance with UK laws protecting whistleblowers, including:

- The Public Interest Disclosure Act 1998 (PIDA), protecting individuals reporting public interest concerns.
- The Health and Safety at Work Act 1974, ensuring a safe working environment.
- The Enterprise and Regulatory Reform Act 2013, strengthening whistleblower protections in good faith disclosures.
- Data Protection Regulations, ensuring compliance with GDPR when reporting data breaches.

1.4 Maintain Ethical Standards

Primus PLUS Healthcare is committed to high ethical standards in our care services. This policy helps ensure that unethical practices, including conflicts of interest and fraud, are identified and addressed. We encourage staff to adhere to principles of integrity, confidentiality, and respect for regulatory frameworks in all aspects of our work.

1.5 Support a Safe Working Environment

This policy ensures that employees, contractors, and consultants feel secure in raising concerns about safety, legal compliance, or confidentiality breaches. Primus PLUS Healthcare is committed to providing psychological safety and ensuring compliance with healthcare regulations within our Supported Living without Personal Care services.

2.0 SCOPE

The Whistleblower Protection Policy and Procedure at Primus PLUS Healthcare applies to a broad range of individuals involved in or associated with our Supported Living without Personal Care services. This policy ensures that all employees, workers, contractors, consultants, and stakeholders can raise concerns related to misconduct, unethical practices, or illegal activities in a safe, confidential, and non-retaliatory manner. It is fully aligned with UK regulatory, legal, and institutional frameworks that govern whistleblower protections, particularly within the healthcare sector.

2.1 Individuals Covered by the Policy

This policy applies to:

- Employees: Full-time, part-time, and temporary employees of Primus PLUS Healthcare.
- Workers: Agency workers, freelancers, interns, and individuals working under contract for services or engagement with Primus PLUS Healthcare.
- Contractors and Consultants: Independent contractors and consultants providing services within our Supported Living without Personal Care services.
- Third Parties: External stakeholders such as suppliers, clients, business partners, and service providers engaged with Primus PLUS Healthcare.
- Service Users and Partners: Individuals within organizations we work with, including those involved in supporting adults with various conditions like dementia, mental health, or physical disabilities.

2.2 Types of Concerns Covered

This policy covers concerns about:

- Criminal Offenses: Fraud, corruption, bribery, theft, or other illegal acts.
- Health and Safety Violations: Unsafe working conditions or practices affecting employees or clients, including breaches of health and safety laws.
- Environmental Harm: Harmful practices affecting the environment, including pollution or improper disposal of materials.
- Financial Malpractice: Concerns related to financial wrongdoing, including misreporting, embezzlement, or misuse of funds.
- Regulatory Violations: Breaches of healthcare sector regulations, including CQC guidelines, contract management, or procurement practices.
- Breach of Data Protection Laws: Mishandling of personal data or non-compliance with GDPR.
- Healthcare Compliance: Non-compliance with healthcare-specific regulations, particularly those from the CQC and NHS.
- Unethical Business Practices: Conflicts of interest, dishonesty, or misconduct in dealings with healthcare providers or contract negotiations.
- Miscarriages of Justice: Wrongful actions leading to unjust outcomes, particularly in contract management and tendering processes.

- Retaliation: Concerns about retaliation against whistleblowers, which should be reported to maintain a safe environment.

2.3 Reporting Mechanisms

Concerns can be reported through:

- Internal Reporting Channels:
    - Direct Supervisor or Line Manager: For employees or workers to raise concerns.
    - Whistleblower Protection Officer (WPO): If reporting to a supervisor is inappropriate.
    - Human Resources (HR): For additional confidentiality or sensitivity.
- External Reporting Channels:
    - Regulatory Authorities: Such as the Care Quality Commission (CQC), Health and Safety Executive (HSE), and the Information Commissioner's Office (ICO) for specific concerns.
    - Anonymous Reporting: Individuals may report anonymously, though contact details are encouraged for follow-up.

2.4 Legal and Regulatory Framework

This policy aligns with key UK laws and regulatory frameworks:

- Public Interest Disclosure Act 1998 (PIDA): Protects individuals from retaliation when raising concerns in the public interest.
- Health and Safety at Work Act 1974: Protects whistleblowers who report health and safety violations.
- Enterprise and Regulatory Reform Act 2013: Strengthens protections for whistleblowers in good faith disclosures.
- Data Protection Act 2018 and GDPR: Governs concerns related to data protection breaches.
- NHS Guidelines and CQC Standards: Provide additional healthcare-specific guidance for reporting concerns.
- Financial Conduct Authority (FCA) and Serious Fraud Office (SFO): Responsible for investigating financial misconduct.
- Public Concern at Work (Protect): A charity offering legal support to whistleblowers.

2.5 Protections for Whistleblowers

This policy provides strong protections for whistleblowers:

- Protection from Retaliation: Safeguards against dismissal, demotion, or harassment.
- Confidentiality: Ensures the whistleblower's identity is protected throughout the process.
- Fair Investigation: Ensures a thorough, impartial investigation of concerns.
- Support and Guidance: Whistleblowers will receive support, including legal advice, if necessary.

2.6 Applicability to Supported Living without Personal Care

This policy is tailored for Primus PLUS Healthcare's Supported Living without Personal Care services. It ensures transparency and accountability in interactions with clients and stakeholders, upholds client confidentiality, and protects sensitive data in accordance with GDPR and healthcare-specific guidelines.

3.0 POLICY STATEMENT

At Primus PLUS Healthcare, we are committed to fostering transparency, integrity, and accountability within our Supported Living without Personal Care services. It is essential that we uphold the highest ethical standards and comply with all legal and regulatory frameworks. We recognize the importance of enabling our employees, workers, contractors, consultants, and other stakeholders to raise concerns about potential wrongdoing or unethical practices, without fear of retaliation.

This Whistleblower Protection Policy and Procedure aims to:

1. Encourage Reporting: Empower individuals within Primus PLUS Healthcare to report misconduct, malpractice, or violations of ethical, legal, or regulatory standards, particularly in healthcare.
2. Provide Protections: Ensure that individuals who report concerns in good faith are protected from retaliation, discrimination, or adverse actions, and that their confidentiality is respected.
3. Promote Accountability: Foster a culture of accountability by establishing clear reporting channels for wrongdoing, ensuring that transparency and compliance are maintained.
4. Maintain Ethical Standards: Ensure that the services we provide in Supported Living without Personal Care are ethical, legal, and comply with regulatory frameworks.
5. Ensure Legal Compliance: Align with UK legislation such as the Public Interest Disclosure Act 1998 (PIDA), Health and Safety at Work Act 1974, and Enterprise and Regulatory Reform Act 2013, as well as healthcare industry regulations.

By implementing this policy, Primus PLUS Healthcare reaffirms its commitment to:

- Upholding the highest standards of ethical behavior.
- Encouraging openness and honesty within our organization.
- Protecting whistleblowers and fostering an environment where concerns can be raised freely.

3.1 Commitment to Transparency and Integrity

We understand the critical role whistleblowers play in maintaining the integrity of business practices. By enabling individuals to report unethical or illegal behavior, we aim to detect and address issues early, preventing harm to our clients and employees.

3.2 Legal and Regulatory Compliance

This policy reflects the following key UK laws and regulations:

- Public Interest Disclosure Act 1998 (PIDA): Protects whistleblowers from retaliation when reporting concerns in the public interest.
- Health and Safety at Work Act 1974: Ensures the safety of employees and the public.

- Enterprise and Regulatory Reform Act 2013: Clarifies protections for disclosures made in good faith.
- Data Protection Act 2018 and GDPR: Ensures whistleblower protection in relation to personal and sensitive data.
- Healthcare Regulations: Aligns with regulations by CQC, NHS, and other relevant bodies for maintaining standards.
- NHS Tendering Guidelines: Ensures compliance with NHS procurement regulations for healthcare-related services.

3.3 Commitment to Protecting Whistleblowers

Whistleblowers will be:

- Protected from Retaliation: No adverse action such as dismissal, harassment, or demotion will occur for raising concerns.
- Provided with Confidentiality: The identity of the whistleblower will be kept confidential where possible.
- Treated with Fairness: Whistleblowers will be supported throughout the process and treated impartially.

4.0 OBJECTIVES

The Whistleblower Protection Policy and Procedure at Primus PLUS Healthcare aims to ensure transparency, integrity, and accountability within our Supported Living without Personal Care services. This policy is designed to meet legal and regulatory standards while aligning with Primus PLUS Healthcare's core values. Below are the key objectives:

4.1 Provide a Clear Reporting Mechanism

This policy ensures there is a transparent and accessible process for reporting concerns:

- Clear Instructions: Easy-to-understand guidance for raising concerns and knowing who to contact.
- Multiple Channels: Various reporting channels (e.g., supervisors, Whistleblower Protection Officer, regulatory bodies).
- Confidentiality: Mechanisms to protect the whistleblower's identity, especially for sensitive issues like client safety.

4.2 Ensure Protection for Whistleblowers

This objective ensures protection from retaliation:

- Unfair Dismissal: Prevents dismissal or other penalties based solely on whistleblowing.
- Harassment or Victimization: Guarantees no harassment or discrimination occurs after reporting.
- Adverse Treatment: Protects against demotion or unfair treatment due to raising concerns.

4.3 Encourage Reporting of Concerns

We aim to foster a culture where individuals feel supported in raising concerns:

- Supportive Environment: Ensuring whistleblowers are taken seriously and supported.
- Clear Communication: Ensuring staff understand the process and are reassured their concerns will be addressed promptly.
- Building Trust: Encouraging dialogue to resolve issues before escalation.

4.4 Promote Ethical Conduct and Transparency

This policy ensures integrity, compliance, and ethical behavior:

- Addressing Unethical Practices: Identifying and resolving breaches of ethics or regulatory standards.
- Promoting Compliance: Ensuring transparency helps maintain compliance with legal and healthcare regulations.
- Preventing Wrongdoing: Identifying misconduct early to prevent harm to individuals and the organization.

4.5 Maintain Compliance with Legal and Regulatory Requirements

This objective ensures Primus PLUS Healthcare stays compliant with:

- Public Interest Disclosure Act 1998 (PIDA): Protects whistleblowers reporting in the public interest.
- Health and Safety at Work Act 1974: Safeguards those reporting safety concerns.
- Enterprise and Regulatory Reform Act 2013: Strengthens protections for good faith disclosures.
- Healthcare-Specific Compliance: Compliance with CQC, NHS, GDPR, and other relevant healthcare regulations.

4.6 Ensure Confidentiality and Fairness in Investigations

We ensure confidentiality and fairness throughout the investigation:

- Protecting Identity: Keeping whistleblower identities confidential.
- Fair Investigations: Conducting thorough and impartial investigations.
- Due Process: Ensuring fair procedures that respect all parties' rights.

4.7 Strengthen Organizational Integrity and Accountability

This policy strengthens Primus PLUS Healthcare's overall integrity:

- Identifying Misconduct: Swiftly addressing issues before they escalate.
- Increasing Trust: Demonstrating our commitment to ethical conduct.
- Enhancing Culture: Building an organizational culture based on ethics and transparency.

4.8 Provide Support and Guidance

We ensure that whistleblowers are supported throughout the process:

- Legal and Emotional Support: Offering guidance and legal support as needed.
- Clear Communication: Keeping whistleblowers informed about the investigation progress.
- Guiding Whistleblowers: Ensuring clarity about reporting channels and the process.

4.9 Raise Awareness and Promote Best Practices

This objective focuses on promoting ethical conduct and awareness:

- Training and Education: Regular training on whistleblowing and its importance.
- Promoting Ethical Standards: Encouraging a culture of compliance and transparency.
- Incorporating into Culture: Making whistleblowing an integral part of Primus PLUS Healthcare's culture.

5.0 LEGAL FRAMEWORK

The Whistleblower Protection Policy and Procedure at Primus PLUS Healthcare is built upon a solid legal framework ensuring compliance with both UK laws and sector-specific regulations. This framework protects whistleblowers, provides clear guidelines for reporting concerns, and aligns the policy with legal obligations in the highly regulated healthcare sector.

5.1 Public Interest Disclosure Act 1998 (PIDA)

PIDA is the main UK legislation protecting whistleblowers and encourages individuals to report concerns about illegal or unethical activities without fear of retaliation.

- Protection Against Retaliation: Whistleblowers are protected from dismissal, demotion, harassment, or other adverse treatment.
- Confidentiality: Whistleblower identity is protected as much as possible, following legal and investigative requirements.
- Whistleblower Rights: Concerns can be reported to internal management, external regulators, or authorities, covering issues like criminal offenses, health and safety risks, and financial misconduct.

5.2 Health and Safety at Work Act 1974

This Act ensures workplace safety and protects individuals who report unsafe working conditions or practices.

- Duty of Care: Employers must ensure the health, safety, and welfare of employees and others affected by their work activities.
- Whistleblower Protections: Safeguards those who raise health and safety concerns from retaliation.
- Reporting Channels: Concerns must be investigated promptly to prevent harm.

5.3 Enterprise and Regulatory Reform Act 2013

This Act amended PIDA, further protecting whistleblowers, particularly concerning the "good faith" requirement.

- Clarification on "Good Faith": Disclosures made in good faith are protected, even if the concerns turn out to be unsubstantiated.
- Expansion of Protected Disclosures: Includes concerns in broader sectors, such as healthcare, ensuring that Primus PLUS Healthcare complies with sector-specific regulations.

5.4 General Data Protection Regulation (GDPR) and Data Protection Act 2018

These regulations ensure the protection of personal data in the whistleblowing process.

- Data Privacy: Whistleblower data, including identities and disclosures, must be securely handled and processed.
- Confidentiality: Whistleblowers have the right to confidentiality, ensuring their identity is protected during investigations.
- Data Access and Control: Whistleblowers can access their data, including updates on the investigation status.

5.5 The Care Quality Commission (CQC) and Healthcare Regulations

As a provider in the healthcare sector, Primus PLUS Healthcare must comply with CQC standards and ensure transparency, accountability, and client safety.

- Promoting Safety and Quality: Ensures that all services are delivered safely, effectively, and ethically.
- Encouraging Whistleblowing: The CQC supports reporting concerns about care quality or safety, aligning with Primus PLUS Healthcare's whistleblowing procedures.

5.6 Other Relevant Regulatory Bodies and Guidelines

In addition to the laws mentioned above, Primus PLUS Healthcare must also comply with regulations governing procurement, contract management, and public sector tendering:

- NHS Procurement Guidelines: Ensures ethical practices in tender applications and procurement processes.
- Financial Conduct Authority (FCA): Addresses concerns related to financial misconduct in healthcare consultancy.
- Information Commissioner’s Office (ICO): Ensures compliance with data protection laws, safeguarding whistleblowers reporting privacy violations.

5.7 Legal and Ethical Considerations in Healthcare Consultancy

Healthcare consultancy involves sensitive work, including public funds, client safety, and regulatory compliance. This policy ensures:

- Public Sector Procurement Laws: Ensures fairness, transparency, and non-discrimination in the procurement process.
- Ethical Standards in Healthcare: Promotes compliance with healthcare laws and professional standards in all aspects of Primus PLUS Healthcare's operations.

6.0 DEFINITIONS

This section defines key terms in the Whistleblower Protection Policy and Procedure to ensure clarity and understanding of the policy, aligning with legal and regulatory standards in Primus PLUS Healthcare’s Supported Living without Personal Care services.

6.1 Whistleblower

A whistleblower is anyone who reports concerns about potential wrongdoing or unethical behavior within Primus PLUS Healthcare or its dealings with external parties. This includes:

- Employees: Full-time, part-time, temporary staff, and interns.
- Contractors and Consultants: Independent workers, particularly those involved in healthcare-related services.

- Third Parties: External individuals such as clients, suppliers, or partners who raise concerns about Primus PLUS Healthcare's operations.

6.2 Protected Disclosure

A protected disclosure is a report made by a whistleblower that is legally protected under UK law, especially under PIDA. To qualify:

- Good Faith: The concern is raised honestly and in the public interest.
- Specific Concerns: It involves criminal offenses, health and safety violations, financial misconduct, or breaches of legal obligations.
- Appropriate Authority: The disclosure is made to a relevant authority (internally within Primus PLUS Healthcare or externally).

6.3 Retaliation

Retaliation refers to any negative action taken against a whistleblower, including:

- Unfair Dismissal: Termination due to reporting wrongdoing.
- Harassment or Victimization: Bullying or mistreatment as a result of the disclosure.
- Demotion or Exclusion: Being penalized for reporting concerns.

Whistleblowers are legally protected from retaliation under PIDA.

6.4 Misconduct

Misconduct includes actions or practices within Primus PLUS Healthcare that violate policies, legal regulations, or ethical standards, such as:

- Fraud or financial mismanagement.
- Health and safety violations.
- Data breaches or mishandling of confidential information, particularly healthcare data.
- Unethical business practices, such as dishonesty or conflicts of interest.

6.5 Wrongdoing

Wrongdoing includes illegal, unethical, or harmful actions that violate laws, company policies, or industry standards:

- Criminal offenses: E.g., bribery, theft, or corruption.
- Regulatory violations: Failure to comply with healthcare regulations or procurement guidelines.
- Health and safety risks: Exposing individuals to unsafe working conditions.
- Environmental harm: Engaging in activities that damage the environment.

6.6 Good Faith

Good faith refers to the honest belief that the disclosure is true and made to address a genuine concern in the public interest, such as ensuring Primus PLUS Healthcare’s compliance with relevant regulations.

6.7 Whistleblower Protection Officer (WPO)

The Whistleblower Protection Officer (WPO) is a designated individual responsible for overseeing the whistleblowing process within Primus PLUS Healthcare, including:

- Receiving disclosures and maintaining confidentiality.
- Providing support and guidance to whistleblowers.
- Ensuring fair and timely investigations.

6.8 Confidentiality

Confidentiality ensures the protection of the whistleblower's identity and the sensitive nature of the information disclosed:

- Identity Protection: Keeping the whistleblower’s identity confidential as far as possible.
- Sensitive Information: Handling confidential information, like client data, with strict adherence to GDPR.

6.9 Investigation

An investigation is a formal process to verify the validity of the disclosure and determine the appropriate action:

- Evidence Gathering: Collecting documents, statements, and other materials.
- Interviews: Speaking with the whistleblower, accused individuals, and witnesses.
- Outcome: Determining whether the concern is substantiated and the necessary corrective actions.

6.10 Malicious Allegation

A malicious allegation is a false or misleading disclosure intended to harm or deceive:

- Intentional Falsehood: Providing false information to damage someone’s reputation.
- Personal Motivation: Using the disclosure to settle personal grievances.

6.11 Reporting Channels

Reporting channels refer to the routes through which whistleblowers can raise concerns:

- Internal Reporting: Whistleblowers can report to their supervisor, manager, or the Whistleblower Protection Officer (WPO) within Primus PLUS Healthcare.
- External Reporting: Concerns may also be raised with relevant regulatory authorities like the Care Quality Commission (CQC), Health and Safety Executive (HSE), or the Information Commissioner’s Office (ICO).

7.0 DEFINITION OF WHISTLEBLOWING

Whistleblowing involves raising concerns about wrongdoing, unethical behavior, or illegal activities within Primus PLUS Healthcare or its dealings with external parties. It serves as a critical tool for ensuring accountability, transparency, and ethical behavior, particularly in the healthcare sector where regulatory compliance and ethical standards are paramount.

7.1 Criminal Offenses

Whistleblowing related to criminal offenses involves reporting illegal activities within Primus PLUS Healthcare, such as:

- Fraud: Deliberate financial deception, including misrepresentation of tender applications or financial records.

- Corruption and Bribery: Offering or receiving bribes in exchange for favorable decisions.
- Other Criminal Activities: Any criminal actions within the organization or with associated parties.

7.2 Miscarriages of Justice

Miscarriages of justice involve situations where legal or regulatory processes are misapplied, leading to wrongful outcomes:

- Incorrect Tender Outcomes: Unfair tendering processes that misallocate public funds or affect client safety.
- Improper Contract Awarding: Unethical practices like favoritism or conflicts of interest.
- Wrongful Decisions in Healthcare: Substandard services or safety violations in healthcare settings.

7.3 Health and Safety Risks

Concerns about health and safety risks refer to practices that endanger the well-being of employees, contractors, clients, or the public:

- Unsafe Work Environments: Failure to comply with health and safety regulations.
- Healthcare Safety Violations: Unsafe medical equipment or hazardous substances in healthcare facilities.
- Inadequate Protective Measures: Insufficient safety measures in healthcare or work environments.

7.4 Environmental Harm

Environmental harm involves practices within Primus PLUS Healthcare or its partners that damage the environment:

- Improper Waste Disposal: Improper handling of medical waste or hazardous materials.
- Non-compliance with Environmental Regulations: Failing to adhere to environmental laws, including the Environmental Protection Act 1990.
- Pollution or Damage: Activities leading to air, water, or land pollution in healthcare settings.

7.5 Financial Malpractice

Financial malpractice refers to unethical financial practices that harm the organization or stakeholders:

- Fraudulent Financial Practices: Misreporting financial information, inflating costs, or misusing funds.
- Improper Billing or Payments: False invoicing or overcharging for services.
- Violation of Financial Regulations: Failing to follow financial or procurement regulations, particularly in healthcare.

7.6 Breaches of Data Protection Regulations

Concerns about data protection involve violations of laws regarding the handling of sensitive information:

- Unauthorized Access or Sharing of Client Data: Mishandling or unauthorized disclosure of confidential data.
- Failure to Adhere to GDPR: Non-compliance with GDPR in healthcare data handling.
- Inadequate Security Measures: Lack of proper security measures to protect sensitive data.

7.7 Failure to Comply with Legal Obligations or Ethical Standards

This involves violations of legal obligations or ethical standards:

- Non-compliance with Healthcare Regulations: Failure to comply with CQC standards or NHS procurement rules.
- Unethical Tendering Practices: Engaging in dishonest practices during the tendering process.
- Breach of Professional Ethics: Violating professional conduct codes, especially those set by healthcare organizations.

8.0 PROTECTED DISCLOSURES

A protected disclosure is a concern raised by a whistleblower that is legally protected under UK law, particularly under the Public Interest Disclosure Act 1998 (PIDA). At Primus PLUS Healthcare, we ensure that any disclosures meeting these legal criteria are handled with the utmost respect, confidentiality, and fairness, especially given the sensitive nature of our Supported Living without Personal Care services.

8.1 It is Made in Good Faith

For a disclosure to be protected, it must be made in good faith. This means the whistleblower must raise their concern with genuine intent, without any malicious motive or personal agenda:

- No Malicious Intent: The whistleblower should not make the disclosure to harm another person or Primus PLUS Healthcare.
- Reasonable Belief: The whistleblower must reasonably believe that the information they are providing is accurate and pertains to a real issue that could affect the integrity of our Supported Living without Personal Care services.

At Primus PLUS Healthcare, we recognize the importance of client safety, contract integrity, and regulatory compliance in healthcare. If a disclosure is made honestly and with reasonable belief, it will be treated as a protected disclosure, regardless of whether the concern turns out to be unsubstantiated.

8.2 The Disclosure Relates to a Legitimate Concern of Wrongdoing

For a disclosure to be protected, it must relate to concerns about wrongdoing or misconduct within Primus PLUS Healthcare or its dealings with external parties. Valid concerns include:

- Criminal Offenses: Concerns about fraud, bribery, corruption, or theft within our organization or in dealings with healthcare providers.
- Health and Safety Risks: Issues about unsafe practices that could harm employees, clients, or the public.
- Environmental Harm: Improper handling of medical waste or failure to comply with environmental regulations.

- Financial Malpractice: Concerns related to financial misconduct, mismanagement of funds, or improper billing practices in healthcare services.
- Regulatory Violations: Breaches of CQC standards, NHS procurement rules, or GDPR data protection requirements.
- Breach of Ethical Standards: Unethical behavior in healthcare consultancy or tendering processes, including conflicts of interest or dishonesty.

8.3 The Whistleblower Reasonably Believes that the Disclosure is in the Public Interest

Under PIDA, a protected disclosure must be made in the public interest, meaning the whistleblower believes their concern has broader implications beyond just Primus PLUS Healthcare. The concern should typically involve:

- Preventing Harm: Issues that could potentially endanger individuals, clients, or public health, such as client safety violations or breaches of care standards.
- Transparency and Accountability: Concerns impacting the integrity of our services, such as fraud or regulatory violations, which could undermine trust in our Supported Living without Personal Care services.
- Upholding Legal or Regulatory Obligations: Concerns about Primus PLUS Healthcare’s failure to comply with healthcare laws or regulatory standards, which could have significant consequences for public trust and safety.

At Primus PLUS Healthcare, we treat disclosures regarding client safety, financial mismanagement, or regulatory non-compliance as being in the public interest, as they affect not only our operations but also the wider community.

8.4 The Disclosure is Made to an Appropriate Recipient

A protected disclosure must be made to an appropriate person or authority within Primus PLUS Healthcare or externally. This ensures the concern is addressed effectively and in line with regulatory and legal requirements:

- Internal Reporting Channels:
    - Supervisors or Line Managers: For workplace concerns or general misconduct.
    - Whistleblower Protection Officer (WPO): A designated person within Primus PLUS Healthcare responsible for handling disclosures and ensuring a fair investigation process.
    - Human Resources (HR): For concerns related to employment practices or retaliation.
- External Reporting Channels: If internal channels are not effective, concerns can be raised with external regulatory bodies such as:
    - Care Quality Commission (CQC): For concerns about the quality and safety of healthcare services.
    - Health and Safety Executive (HSE): For health and safety concerns in the workplace.
    - Financial Conduct Authority (FCA): For financial misconduct in procurement or contract applications.
    - Serious Fraud Office (SFO): For serious fraud or corruption matters.

- Information Commissioner’s Office (ICO): For breaches of data protection or privacy regulations (e.g., GDPR violations).

- Anonymous Reporting: While Primus PLUS Healthcare encourages transparency and open communication, whistleblowers may choose to remain anonymous when making a disclosure, though providing contact details is recommended to facilitate follow-up and investigation.

9.0 REPORTING CONCERNS

The Reporting Concerns section of the Whistleblower Protection Policy and Procedure at Primus PLUS Healthcare establishes the process by which our employees, workers, contractors, consultants, and other stakeholders can raise concerns about potential wrongdoing, unethical behavior, or illegal activities. Our goal is to ensure that all reports are handled in a manner that encourages openness, maintains confidentiality, and provides protection against retaliation. This process is designed to ensure compliance with relevant UK regulations and the ethical standards required in the healthcare sector.

9.1 Internal Reporting Procedure

Primus PLUS Healthcare encourages all individuals to raise concerns about wrongdoing internally as their first course of action. Internal reporting enables us to address issues promptly, investigate concerns, and take corrective actions when necessary. Our internal reporting procedure is as follows:

1. Initial Reporting
    - Concerns should be raised first with the individual’s immediate supervisor or line manager. This ensures that the concern is addressed quickly within the relevant team, and the supervisor can take appropriate action.
    - If the issue involves a conflict of interest, the whistleblower may report the concern directly to the Whistleblower Protection Officer (WPO), who is designated to handle such disclosures confidentially and impartially.
    - Employees or contractors can raise concerns about misconduct, unethical behavior, violations of health and safety, financial malpractice, or breaches of data protection laws, particularly in the context of Supported Living without Personal Care, using the appropriate internal channels.
2. Escalation
    - If the whistleblower feels uncomfortable reporting their concern to their immediate manager or believes the concern has not been addressed satisfactorily, they may escalate the matter to the Whistleblower Protection Officer (WPO) or another senior member of the management team.
    - In cases where the issue involves senior management or a potential conflict of interest with those involved, the concern should be raised directly with the WPO or a designated independent person to ensure impartiality and that the matter is handled appropriately.
3. Confidentiality
    - Primus PLUS Healthcare is committed to ensuring that all concerns raised through the whistleblowing process are treated with confidentiality. The

whistleblower's identity will be protected to the extent possible unless disclosure is required by law or necessary for the proper conduct of the investigation.

    - Employees and stakeholders should feel secure that they can report concerns without the fear of their identity being disclosed or facing retaliation for raising concerns.

9.2 External Reporting Procedure

While Primus PLUS Healthcare encourages internal reporting of concerns, there may be instances where an individual feels that their concerns have not been addressed satisfactorily, or the issue is too serious to be handled internally. In such cases, whistleblowers can escalate the matter externally to relevant regulatory bodies or authorities. Our Whistleblower Protection Policy and Procedure ensures that individuals are aware of their rights and the appropriate channels for reporting concerns externally.

The external reporting procedure includes the following steps and relevant authorities:

- Health and Safety Executive (HSE):
    - Concerns regarding safety: If a whistleblower is concerned about health and safety risks that have not been addressed internally, they can report the matter to the HSE.
    - Examples of concerns: Unsafe working conditions, failure to comply with safety regulations, or risks that could endanger the health and safety of employees or others.
- Financial Conduct Authority (FCA):
    - Concerns regarding financial misconduct: If there are concerns about financial malpractice, such as fraudulent activities, improper accounting practices, or violations of financial regulations, these can be reported to the FCA.
    - Examples of concerns: Fraudulent invoicing, mismanagement of funds in healthcare tender applications, or failure to follow financial regulations in the consultancy process.
- Serious Fraud Office (SFO):
    - Concerns regarding serious financial crime: If a whistleblower believes there has been a serious financial crime, such as fraud, corruption, or bribery, they can escalate the concern to the SFO.
    - Examples of concerns: Corruption in procurement, bribery in securing contracts, or other serious financial crimes that may affect healthcare consultancy operations.
- Information Commissioner's Office (ICO):
    - Concerns regarding breaches of data protection laws: If there are concerns about data protection violations or breaches of confidentiality, particularly regarding client or client data, the whistleblower may report the matter to the ICO.
    - Examples of concerns: Unauthorized access to personal data, improper sharing of client information, or failure to comply with GDPR.
- Public Concern at Work (Protect):

    - Legal advice and support for whistleblowers: Protect is an independent UK charity that offers legal advice and support for whistleblowers. If an individual is unsure of how to report their concern or if they face retaliation, they can seek guidance from Protect.
    - Examples of services provided: Confidential advice on how to report a concern, guidance on legal rights, and support navigating the whistleblowing process.

Key Considerations for External Reporting

- Safeguards for Whistleblowers: When escalating concerns externally, whistleblowers will continue to be protected under PIDA, and their identities will be kept confidential to the extent possible. Primus PLUS Healthcare encourages individuals to report concerns both internally and externally, depending on the severity of the issue or if they feel their concern has not been adequately addressed.
- Encouraging Responsible Reporting: While we strongly encourage internal reporting, Primus PLUS Healthcare recognizes that external reporting may be necessary for legal, ethical, or safety reasons, especially in the healthcare sector.
- Investigation and Follow-Up: Concerns raised externally may be investigated by the relevant regulatory authority. However, Primus PLUS Healthcare will cooperate with external bodies and ensure that any concerns reported externally are addressed thoroughly, and appropriate actions are taken to resolve the issue.

10.0 HANDLING OF DISCLOSURES

The Handling of Disclosures section of the Whistleblower Protection Policy and Procedure at Primus PLUS Healthcare outlines the process for receiving, investigating, and addressing concerns raised by whistleblowers. We are committed to treating all disclosures seriously, ensuring that concerns are handled with fairness, confidentiality, and in compliance with relevant legal and regulatory requirements, particularly in the context of our Supported Living without Personal Care services. This procedure aligns with UK laws such as the Public Interest Disclosure Act 1998 (PIDA), Health and Safety at Work Act 1974, GDPR, and other relevant regulations in the healthcare sector.

10.1 Handling of Disclosures

The process for handling disclosures will follow a structured and transparent procedure designed to protect whistleblowers, ensure confidentiality, and address concerns promptly and effectively. All concerns raised through the whistleblowing process will be treated with the utmost seriousness and respect. The steps of this process include:

1. **Acknowledging Receipt of the Concern**
    - Upon receiving a whistleblowing report, Primus PLUS Healthcare will acknowledge the concern within a set timeframe (typically within 3 business days). This ensures that the whistleblower knows their concern has been received and is being taken seriously.
    - A formal receipt notification will be provided to the whistleblower, outlining the steps Primus PLUS Healthcare will take to address the concern.
2. **Assigning an Investigator or Investigation Team**

- We will assign a designated investigator or a team of investigators to look into the concern raised. This team will include impartial, objective individuals with the necessary skills to investigate the issue thoroughly.
- The investigator(s) will be independent of any parties involved in the concern being raised to avoid conflicts of interest and maintain fairness in the process.
- The investigator will review the facts, gather relevant evidence, and determine the necessary steps for resolution.

3. **Interviewing the Whistleblower and Relevant Parties**
    - If needed, the whistleblower will be interviewed to clarify the details of their concern and gather any additional information necessary for the investigation.
    - The whistleblower's identity will be kept confidential where possible, and they will be assured protection from retaliation.
    - Relevant parties, such as the accused individuals, witnesses, and other involved stakeholders, will also be interviewed. The investigator will ensure that all individuals are treated fairly, their rights are respected, and all necessary evidence is gathered to fully understand the issue.
4. **Documenting Findings and Ensuring Appropriate Actions**
    - All findings from the investigation will be documented comprehensively, including evidence collected, interviews conducted, and any other relevant details, ensuring transparency and providing a record of the process.
    - The investigator will assess whether the concern raised is substantiated and, if so, recommend appropriate actions based on the findings. Actions may include corrective measures, disciplinary action, policy updates, or other steps necessary to resolve the issue.
    - If the concern involves legal or regulatory violations, the relevant authorities (e.g., CQC, HSE, FCA, ICO) may be informed as necessary.
5. **Ensuring Fairness and Objectivity**
    - Throughout the investigation process, Primus PLUS Healthcare will ensure that all parties involved are treated with fairness and objectivity. This includes ensuring that the whistleblower is not subject to retaliation, the accused party is treated fairly, and any individuals involved in the investigation have their rights respected.
    - We will maintain confidentiality throughout the process, protecting the identity of the whistleblower and the details of the disclosure to the extent possible.

10.2 Timeframes

To ensure that concerns are addressed promptly and effectively, Primus PLUS Healthcare will adhere to a set of timeframes for investigating and resolving whistleblowing concerns. These timeframes provide transparency and ensure that the whistleblower is kept informed of the progress:

1. **Initial Acknowledgment of a Report**
    - Once a report is received, the whistleblower will receive an acknowledgment of the concern within 5 business days. This acknowledgment will confirm that the report has been received and outline the next steps in the investigation process.

- This ensures that the whistleblower knows their concern is being taken seriously and is part of a transparent process.

2. **Full Investigation Timeframe**
   - The full investigation will typically take 3 weeks. This timeframe may vary depending on the complexity of the matter, the number of individuals involved, and the extent of the evidence to be reviewed.
   - Investigations that are more complex or involve multiple parties may take longer, but Primus PLUS Healthcare will strive to complete the investigation in a reasonable timeframe without compromising thoroughness or fairness.
   - If the investigation requires more time than anticipated, the whistleblower will be informed promptly and provided with an updated timeline.
3. **Reporting Back to the Whistleblower**
   - After the investigation is concluded, the whistleblower will be informed of the outcome, including the findings of the investigation and any actions taken as a result of the disclosure. The details shared will be consistent with legal and confidentiality requirements.
   - In cases where confidentiality must be maintained or legal constraints prevent full disclosure of the outcomes, the whistleblower will be provided with as much information as possible regarding the resolution of the issue.
4. **Follow-Up Actions**
   - If the investigation reveals that corrective actions or changes to company policies are necessary, these actions will be implemented promptly. This could involve revising internal processes, updating training protocols, or taking disciplinary actions against individuals found to have engaged in misconduct.
   - The Whistleblower Protection Officer (WPO) will ensure that the actions are followed through and any necessary changes are made to prevent future incidents of misconduct or wrongdoing.

11.0 PROTECTION OF WHISTLEBLOWERS

The Protection of Whistleblowers section of the Whistleblower Protection Policy and Procedure at Primus PLUS Healthcare ensures that individuals who report concerns in good faith are fully protected from retaliation, victimization, and discrimination. We recognize the vital role whistleblowers play in maintaining the integrity of Primus PLUS Healthcare, particularly within the context of Supported Living without Personal Care services. This section outlines the specific measures Primus PLUS Healthcare will take to protect whistleblowers and ensure they are treated fairly and respectfully throughout the process.

Our commitment to protecting whistleblowers is in line with UK regulations, including the Public Interest Disclosure Act 1998 (PIDA), the Health and Safety at Work Act 1974, the General Data Protection Regulation (GDPR), and other relevant laws that govern whistleblowing protections, particularly in the healthcare sector.

11.1 Anti-Retaliation Measures

One of the core objectives of this policy is to ensure that whistleblowers who make protected disclosures are shielded from retaliation in any form. Primus PLUS Healthcare is committed to providing a safe and supportive environment where individuals can report concerns without fear of negative consequences. Anti-retaliation measures include protection from:

1. Dismissal:
    - Whistleblowers cannot be fired or dismissed for raising concerns about wrongdoing or misconduct, particularly in client safety, financial misconduct, or regulatory violations.
    - Any dismissal following a protected disclosure will be treated as retaliation and may result in legal consequences for Primus PLUS Healthcare.
2. Demotion:
    - Whistleblowers cannot be demoted, reassigned to a less favorable role, or have their job responsibilities altered as a result of their disclosure.
3. Harassment:
    - Any form of harassment—whether verbal, physical, or emotional—against a whistleblower will not be tolerated. Harassment includes bullying, intimidation, or creating a hostile work environment due to a whistleblower's action.
4. Victimization:
    - Whistleblowers cannot face victimization, which may include exclusion from work events, denial of opportunities for advancement, or a hostile work environment after making a disclosure.
5. Discrimination:
    - Whistleblowers cannot be discriminated against for raising a legitimate concern. This includes denial of equal treatment or opportunities within Primus PLUS Healthcare because of their whistleblowing.

If a whistleblower believes they are being retaliated against for making a protected disclosure, they are encouraged to report the issue to the Whistleblower Protection Officer (WPO), who will investigate the matter and take appropriate actions to prevent further retaliation.

11.2 Safeguards for Confidentiality

Confidentiality is paramount in maintaining trust in the whistleblowing process, particularly in sensitive fields like healthcare. Primus PLUS Healthcare is committed to protecting the identity of whistleblowers and maintaining confidentiality throughout the disclosure and investigation process, unless required by law or necessary for the investigation. We will take all reasonable steps to protect the whistleblower's identity and prevent retaliation.

Key confidentiality safeguards include:

1. Protection of the Whistleblower's Identity:
    - The identity of the whistleblower will be kept confidential within Primus PLUS Healthcare, and only individuals directly involved in the investigation will be informed.
    - Disclosure of the whistleblower's identity will only occur when required by law or necessary for investigation purposes.
2. Limited Disclosure:

- The whistleblower’s identity will not be disclosed unless explicitly authorized by the whistleblower or required by law, such as when disclosure is necessary to protect public safety or comply with legal obligations.
- In cases where confidentiality must be breached (e.g., when providing evidence in legal proceedings), the whistleblower will be informed in advance and supported through the process.

3. Anonymous Reporting:
    - Whistleblowers may choose to remain anonymous if they are concerned about confidentiality. However, we encourage whistleblowers to provide their contact details to facilitate follow-up questions, clarifications, or additional information during the investigation process.
    - We will make every effort to protect the identity of anonymous whistleblowers, though it may be harder to follow up or investigate anonymous concerns fully.
4. GDPR Compliance:
    - In line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, Primus PLUS Healthcare ensures that any personal data related to the whistleblowing process is handled securely and used only for investigative purposes. We protect the whistleblower's personal information and maintain confidentiality.
5. Information Security:
    - All whistleblowing-related information, including details of the concern raised, the whistleblower’s identity (if disclosed), and investigation results, will be securely stored.
    - Access to this information will be restricted to those involved in the investigation, and we will implement appropriate safeguards to ensure the information is not disclosed improperly.

Additional Protections and Considerations

- Non-Retaliation Agreement:
    - Primus PLUS Healthcare may require employees, contractors, and consultants to acknowledge their understanding of our whistleblowing policy and non-retaliation provisions during onboarding or through ongoing training.
- Training and Awareness:
    - Employees, managers, and relevant stakeholders will receive regular training on the Whistleblower Protection Policy and Procedure, emphasizing the importance of protecting whistleblowers and the consequences of retaliation or harassment. This ensures that the policy is actively enforced and understood across Primus PLUS Healthcare.

12.0 FALSE AND MALICIOUS ALLEGATIONS

The False and Malicious Allegations section of the Whistleblower Protection Policy and Procedure at Primus PLUS Healthcare outlines our approach to handling situations where allegations of wrongdoing are found to be intentionally false or malicious. This section ensures that the whistleblowing process is not misused for personal gain, to harm others, or to create unnecessary disruptions. It also establishes the balance between protecting genuine whistleblowers and maintaining the integrity of the system against those who may attempt to undermine the process by making unfounded or harmful accusations.

At Primus PLUS Healthcare, we acknowledge the importance of encouraging reporting of legitimate concerns. However, we are equally committed to addressing cases where disclosures are made maliciously or falsely. Our policy ensures that such allegations are handled fairly, with appropriate safeguards to protect all parties involved, and in full compliance with UK legal and regulatory standards.

This section aligns with UK legal frameworks, including PIDA, the Health and Safety at Work Act 1974, the Enterprise and Regulatory Reform Act 2013, and relevant healthcare regulations, to ensure that any claims of false or malicious reporting are addressed responsibly and fairly.

12.1 Definition of False and Malicious Allegations

A false and malicious allegation refers to a disclosure made with the intent to harm, deceive, or disrupt, rather than to raise a legitimate concern about wrongdoing, misconduct, or illegal activities. Such allegations may be made with the intent to:

- Harm an Individual: The whistleblower may be trying to damage the reputation or career of an individual, particularly in cases involving personal or professional grievances.
- Disrupt Primus PLUS Healthcare: The whistleblower may have an ulterior motive to disrupt the normal functioning of Primus PLUS Healthcare or damage our operations or reputation.
- Gain Personal Advantage: The whistleblower may seek to manipulate the process for personal gain, such as securing promotions, avoiding responsibilities, or deflecting attention from their own misconduct.
- Undermine the Whistleblowing Process: The whistleblower may aim to discredit the process or discourage legitimate whistleblowers from coming forward by making false claims.

12.2 Consequences of False and Malicious Allegations

While Primus PLUS Healthcare is committed to protecting individuals who raise legitimate concerns, we are equally committed to addressing instances where the whistleblowing process is abused. False and malicious allegations can cause serious harm to both the individuals involved and Primus PLUS Healthcare as a whole, including:

- Reputational Damage: False claims can harm the reputation of individuals accused, as well as Primus PLUS Healthcare's credibility and trustworthiness.
- Unnecessary Disruptions: Investigating unfounded allegations diverts resources away from legitimate concerns, causing delays or disruptions in operations.
- Harm to Workplace Relationships: False accusations create mistrust and a toxic work environment, damaging relationships among employees, contractors, and management.
- Legal Consequences: False or malicious allegations can lead to legal claims for defamation, harassment, or other legal actions against the individual making the accusation.

Primus PLUS Healthcare will take incidents of false or malicious reporting seriously and will pursue appropriate actions to resolve the situation and protect the integrity of the whistleblowing process.

12.3 Investigation of False or Malicious Allegations

If Primus PLUS Healthcare suspects that an allegation made under the whistleblowing process is false or malicious, we will conduct a thorough investigation. The investigation will involve:

- Review of Evidence: We will examine the evidence provided in support of the disclosure to assess whether the claim is substantiated by facts, documentation, or credible witness testimony.
- Interviewing the Whistleblower: If appropriate, the whistleblower will be interviewed to understand the reasons for the disclosure and whether there is evidence to substantiate the concern. This will help determine if the disclosure was made in good faith.
- Interviewing the Accused: The individual(s) accused of wrongdoing will be interviewed as part of the investigation. They will be informed of the allegations and given an opportunity to respond.
- Witness Testimony: Relevant witnesses will be interviewed to determine whether the concern raised is factual and supported by credible evidence.
- Determining Intent: The investigation will assess whether the whistleblower acted with malicious intent or made the disclosure with a reasonable belief in the validity of the concern.

If the investigation concludes that the disclosure was made with the intent to harm, deceive, or disrupt, Primus PLUS Healthcare will take appropriate action. This may include:

- Disciplinary Action: The individual who made the false or malicious disclosure may face disciplinary action, including potential termination of employment or contract, depending on the severity of the conduct.
- Reporting to Relevant Authorities: If the false or malicious disclosure has caused significant harm, Primus PLUS Healthcare may report the incident to the relevant regulatory bodies or law enforcement agencies for further action.

12.4 Legal and Ethical Considerations in Handling False Allegations

While addressing false and malicious allegations is crucial for maintaining the integrity of the whistleblowing process, Primus PLUS Healthcare is committed to ensuring that all individuals are treated fairly throughout the investigation. We will ensure that:

- Due Process is Followed: Investigations will be conducted impartially, and all parties involved will have the opportunity to present their case. We will adhere to the principles of natural justice and procedural fairness to avoid unjust treatment.
- Protection of Rights: Individuals accused of making false allegations will be protected from unfair treatment and will be provided with the opportunity to respond to the allegations.
- Confidentiality is Maintained: Information about the investigation will be treated confidentially, and the identity of individuals involved will be protected to the extent possible.

  The investigation will also comply with relevant legal standards, such as PIDA, GDPR, and other regulatory frameworks, to ensure fairness, transparency, and legal compliance.

12.5 Preventing False and Malicious Allegations

Primus PLUS Healthcare takes proactive steps to prevent false and malicious allegations by:

- Clear Communication of Whistleblowing Procedures: We ensure that all employees, contractors, and stakeholders are well-informed about the whistleblowing process and the importance of making disclosures in good faith. This includes regular training and awareness programs on ethical conduct and whistleblowing policies.
- Encouraging Genuine Concerns: We foster a culture of openness and transparency, where individuals feel safe to report legitimate concerns without fear of retaliation or legal consequences, reducing the likelihood of misuse of the whistleblowing process.
- Monitoring and Reviewing the Process: We regularly review and audit the whistleblowing process to identify potential areas for improvement and ensure that the policy is being followed effectively.

13.0 ROLES AND RESPONSIBILITIES

The Roles and Responsibilities section defines the key individuals responsible for implementing, managing, and enforcing the Whistleblower Protection Policy at Primus PLUS Healthcare, ensuring compliance with UK laws and promoting transparency in our Supported Living without Personal Care services.

13.1 Whistleblower

The whistleblower is responsible for:

- Raising genuine concerns in good faith.
- Following reporting procedures and cooperating with investigations.
- Maintaining confidentiality of the process.

13.2 Whistleblower Protection Officer (WPO)

The Whistleblower Protection Officer (WPO) is responsible for:

- Receiving and acknowledging disclosures confidentially.
- Coordinating investigations and ensuring fairness.
- Supporting whistleblowers and ensuring protection against retaliation.
- Reporting to senior management.

13.3 Senior Management

Senior management is responsible for:

- Setting the tone for a culture of transparency and integrity.
- Ensuring resources, training, and systems are in place to handle whistleblowing concerns.
- Overseeing the whistleblowing process and reviewing the policy for continuous improvement.

13.4 Investigators

Investigators are responsible for:

- Conducting impartial investigations, gathering evidence, and reporting findings.
- Providing recommendations based on investigation results.

13.5 Human Resources (HR)

HR supports the process by:

- Providing support to whistleblowers.
- Ensuring fair treatment of employees and handling disciplinary actions related to misconduct.
- Maintaining confidentiality and compliance with GDPR.

13.6 Legal Advisors

Legal advisors provide:

- Guidance on compliance with relevant laws (e.g., PIDA, GDPR).
- Ensuring that investigations and whistleblower rights are legally protected.

13.7 Employees and Contractors

Employees and contractors are responsible for:

- Raising concerns about wrongdoing and cooperating with investigations.
- Supporting a whistleblower-friendly culture to prevent retaliation.

14.0 TRAINING AND AWARENESS

The Training and Awareness section of the Whistleblower Protection Policy and Procedure at Primus PLUS Healthcare emphasizes our commitment to ensuring that all employees, contractors, consultants, and relevant stakeholders are fully informed about the whistleblowing **process**, their rights and responsibilities, and how to appropriately report concerns. This is crucial in creating a culture of transparency, accountability, and compliance with legal and ethical standards, especially in the highly regulated healthcare sector and Supported Living without Personal Care**.**

This section ensures that Primus PLUS Healthcare complies with relevant UK laws, including the Public Interest Disclosure Act 1998 (PIDA)**,** Health and Safety at Work Act 1974**,** GDPR, and other legislation that influences whistleblower protection in the workplace, especially in healthcare.

14.1 Purpose of Training and Awareness

The purpose of our training and awareness initiatives is to:

1. Ensure Understanding of Whistleblowing Procedures**:** All employees and stakeholders should fully understand how to raise concerns, the process involved, and the protections available when making disclosures.
2. Promote a Safe and Transparent Environment**:** Training will encourage a culture where whistleblowing is viewed as a positive action supporting Primus PLUS Healthcare**'s** commitment to high ethical standards, legal compliance, and transparency.

3. Ensure Legal and Regulatory Compliance: Training employees and contractors on legal frameworks surrounding whistleblowing (including PIDA**,** GDPR, and relevant healthcare regulations) ensures compliance with national laws and our legally sound approach to handling disclosures.
4. Prevent Misuse of the Whistleblowing Process: Clear training will help prevent the process from being misused for personal vendettas, false claims, or malicious purposes.
5. Encourage Reporting in Good Faith: Training promotes the importance of raising concerns in good faith, ensuring employees understand that whistleblowing is vital for the health and safety of Primus PLUS Healthcare and the public.

14.2 Target Audience for Training

Training and awareness programs will be tailored to different groups within Primus PLUS Healthcare to ensure that everyone understands their responsibilities related to the whistleblowing process. The target audience includes:

1. All Employees**:**
   - General Awareness: All employees must be made aware of the whistleblower protection policy, how to report concerns, and protections available under PIDA and other relevant regulations.
   - Training Content: Employees should understand how to recognize unethical behavior, the types of issues to report (e.g., fraud, health and safety violations), and the steps involved in raising concerns.
   - Focus on Protection and Confidentiality: Emphasis on protections against retaliation and the importance of confidentiality in the process.

2. Managers and Supervisors:
   - Specific Responsibilities: Managers and supervisors are the first point of contact for whistleblowers. They need specialized training to address concerns, support whistleblowers, and escalate issues.
   - Handling Disclosures: Training on how to receive, acknowledge, and support whistleblowers appropriately.
   - Recognizing Retaliation: Training on recognizing and preventing retaliation or discrimination against whistleblowers.

3. Whistleblower Protection Officer (WPO)**:**
   - Role-Specific Training: The WPO receives in-depth training on managing and investigating disclosures, ensuring confidentiality, and complying with relevant regulations.
   - Legal and Ethical Guidelines: The WPO is trained in PIDA**,** GDPR, and healthcare-specific regulations to effectively manage the process.

4. Senior Management**:**
   - Oversight and Compliance: Senior management must be trained on the whistleblowing process, their role in supporting it, and how to ensure it is implemented effectively.
   - Cultural Leadership: Senior leaders must set an example by fostering a culture of transparency and encouraging whistleblowing.

5. External Contractors and Consultants:
    - Awareness of Policy: Contractors, especially those in healthcare consultancy, should understand the whistleblowing policy and their right to report concerns.
    - Contractual Obligation: Contractors must be made aware that adherence to ethical standards and reporting concerns is part of their contractual obligation.

14.3 Training Content

The training content will cover all critical aspects of the whistleblowing process, including:

1. Overview of the Whistleblower Protection Policy**:**
    - Definition of Whistleblowing: Understanding what constitutes whistleblowing and what types of concerns can be raised (e.g., fraud, health and safety violations, financial misconduct).
    - Legal Protections: Information on protections provided under PIDA**,** GDPR**,** and other relevant laws, including protection from retaliation and discrimination.

2. Reporting Concerns**:**
    - How to Report: Instructions on reporting concerns internally, including who to contact (e.g., supervisor, line manager, WPO) and how to escalate concerns.
    - External Reporting Channels: Guidance on external channels such as HSE**,** FCA**,** ICO, etc.

3. Handling Disclosures**:**
    - Investigation Process: Explanation of the steps involved in investigating concerns, including confidentiality, fairness, and timelines.
    - Ensuring Fairness: How Primus PLUS Healthcare ensures disclosures are handled fairly and impartially.

4. Anti-Retaliation Protections:
    - Retaliation Prevention: Training on recognizing, preventing, and addressing retaliation.
    - Consequences of Retaliation: Legal and organizational consequences for retaliation.

5. Confidentiality and Data Protection:
    - Confidentiality Requirements: The importance of maintaining confidentiality throughout the process.
    - Data Protection: Ensuring compliance with GDPR and the Data Protection Act 2018**.**

6. Role of the Whistleblower Protection Officer (WPO)**:**
    - WPO Duties: Training on how the WPO manages and investigates disclosures.
    - Escalation Procedures: How the WPO escalates concerns to senior management or external authorities when necessary.

14.4 Methods of Delivery

Training will be delivered through various methods to ensure engagement and understanding:

1. In-Person Training Sessions: Interactive workshops with discussions, Q&A, and case studies.
2. Online Training Modules: Accessible e-learning modules for flexibility.
3. Refresher Courses: Regular training to keep everyone up to date with policy changes.
4. Written Materials: Access to policy documents, FAQs, and quick reference sheets.

14.5 Evaluation and Continuous Improvement

To ensure the effectiveness of training:

- Evaluate Training Effectiveness**:** Regular assessments of the training programs to identify areas for improvement.
- Gather Feedback**:** Collect feedback from employees and contractors on training clarity and relevance.
- Continuous Improvement: Review and update training materials regularly to reflect changes in laws, regulations, or internal policies.

15.0 REVIEW AND UPDATES

The Review and Updates section ensures that Primus PLUS Healthcare's Whistleblower Protection Policy remains effective, up-to-date, and aligned with legal and regulatory requirements. The review process is aimed at maintaining best practices, ensuring compliance, and adapting to organizational changes.

15.1 Purpose of Reviewing and Updating the Policy

The purpose of reviewing and updating the policy is to:

- Ensure compliance with evolving legal and regulatory requirements.
- Align with best practices for handling disclosures.
- Adapt to organizational changes in Supported Living without Personal Care.
- Enhance the effectiveness of the whistleblowing process.

15.2 Review Process

The review process includes:

- Periodic Reviews: The policy is reviewed at least annually and when significant organizational changes occur.
- Legal and Regulatory Updates: Regular monitoring of laws and regulations (e.g., PIDA, GDPR, CQC) to ensure compliance.
- Internal Feedback and Reporting: Gathering feedback from employees and stakeholders to assess the policy’s effectiveness.
- Consultation with External Stakeholders: Consulting external experts to ensure the policy remains aligned with industry standards.

15.3 Updates and Amendments

Updates may include:

- Legislative Changes: Adjustments to comply with new or amended laws.

- Internal Process Improvements: Refining reporting mechanisms, response times, and confidentiality safeguards.
- Enhanced Protection Measures: Strengthening anti-retaliation measures and improving confidentiality protocols.
- Changes to Reporting Mechanisms: Updating external regulatory channels or improving escalation processes.
- Training and Awareness Updates: Revising training content based on changes in the policy.

15.4 Communication of Updates

Updates will be communicated to all stakeholders:

- Internal Communication: Employees, contractors, and consultants will be notified via email, internal bulletins, and training sessions.
- External Communication: Clients, suppliers, contractors, and consultants will be informed of relevant updates.
- Ongoing Awareness Campaigns: Periodic campaigns to keep all stakeholders informed of the whistleblowing process and protections.

15.5 Documenting the Review and Updates Process

Primus PLUS Healthcare will document:

- Dates of Reviews and reasons for updates.
- Details of Changes Made to the policy.
- Rationale for Changes, based on legal or regulatory updates, stakeholder feedback, and best practices.

WHISTLEBLOWING CONCERN REPORTING FORM (INTERNAL REPORTING)

Confidentiality Notice: This form is to be completed when reporting a concern or misconduct. Your identity will be protected, and the information provided will be treated confidentially, following the company's Whistleblowing Policy.

1. Personal Information

(Please provide your details for follow-up if necessary. Your identity will be kept confidential to the extent permitted by law.)

Full Name: ____

Department/Unit: ____

Position: ____

Email Address: ____

Phone Number (optional): _____________________________

2. Nature of the Concern

(Please provide a clear and concise description of the concern or misconduct you are reporting.)

Date(s) of Incident(s): _________________________________

Location of Incident(s): _________________________________

Describe the Concern: ____
____
____
____
____

3. Reporting Person/Entity Involved

(Please provide details of the individual(s) or entity (ies) that are the subject of this concern.)

Name(s) of Person(s) or Department(s) Involved: ____________________________

Position(s) of Individual(s): ____

Relation to you: ____

4. Evidence Supporting Your Concern

(Please include any documents, emails, screenshots, or other materials that may support the concern you are reporting.)

Type of Evidence (e.g., email, document, witness statements): ________________

Evidence Description: ____
____
____
____
____

5. Previous Actions Taken

(If you have raised this concern before, please specify the steps already taken, who was informed, and the outcome.)

Have you raised this concern previously? (Yes/No): ____________________________

If yes, with whom and when? ____

Outcome (if any): ____
____
____
____
____

6. Additional Information

(Please provide any other relevant information that may help in the investigation.)

Further Details:

____
____
____
____
____

7. Acknowledgment

(By submitting this form, you acknowledge that the information provided is accurate to the best of your knowledge. You understand that retaliation against a whistleblower is prohibited by law and company policy.)

Signature (optional): ____

Date: ____

For Internal Use Only:

Report Received by: ____

Date of Receipt: ____

Action Taken/Investigation Initiated: ______________________________

Assigned Investigator(s): ____

Status of Investigation: ____

Follow-up Date: ____

WHISTLEBLOWING ACKNOWLEDGEMENT FORM

Confidentiality Notice:

The information provided in this form is confidential and intended solely for the purpose of acknowledging the receipt of a whistleblowing report. The whistleblower's identity will be protected to the fullest extent possible in accordance with the company's policies.

1. Acknowledgement of Report Receipt

By signing this form, I acknowledge that I have received and reviewed the whistleblowing concern submitted by the reporting individual. The report contains information regarding concerns of misconduct or wrongdoing that require investigation. The whistleblower's identity has been kept confidential.

Report Received By: ____

Position: ____

Date of Receipt: ____

Whistleblower Report ID (if applicable): __________________________

2. Summary of the Concern Reported

Nature of Concern(s): ____
____
____
____
____

Date(s) of Incident(s): _________________________________

Department(s) or Person(s) Involved: _________________________________

3. Acknowledgement of Investigation Process

I understand that the report will be reviewed and investigated according to the company's Whistleblowing Policy. I am aware that an investigation may be initiated, and any necessary follow-up action will be taken in compliance with the policy.

Investigation Team Assigned: _____________________________

Investigation Start Date: ______________________________

Investigation Status: ____

4. Whistleblower Protection Assurance

I acknowledge that retaliation against any individual who has reported a concern in good faith is prohibited by the company's Whistleblowing Policy. The whistleblower will be protected from any adverse action resulting from their report.

5. Acknowledgement Confirmation

By signing below, I confirm that I have received the report, and I understand my responsibilities regarding confidentiality, the protection of the whistleblower, and the investigation process.

Name of Acknowledging Individual: ______________________________

Signature: ______________________________________

Date: ______________________________________

For Internal Use Only:

Follow-up Date(s): ______________________________________

Status of Investigation: ________________________________

Further Action(s) Taken: ________________________________

WHISTLEBLOWING INVESTIGATION REPORT FORM

Confidentiality Notice:

The information provided in this form is confidential and intended solely for the purpose of documenting the findings of a whistleblowing investigation. All information will be kept confidential to the extent permitted by law and in accordance with the company's policies.

1. Report Details

Investigation Report ID: ____

Date of Report: ____

Whistleblower Report ID (if applicable): _________________________

Investigation Lead: ____

Date Investigation Initiated: _________________________________

2. Summary of Concern

Nature of Concern(s):

____
____
____
____
____

Date(s) of Incident(s): _________________________________

Department(s) or Person(s) Involved: _________________________________

3. Investigation Findings

Provide a detailed summary of the findings from the investigation, including information collected from interviews, documents, or other evidence:

Findings:

____
____
____
____

4. Conclusions

Provide a summary of the conclusions reached based on the findings of the investigation. Include whether the concern was substantiated or unsubstantiated, and the rationale for the conclusion.

Conclusion:

____
____
____
____

____

5. Action(s) Taken

List the actions taken as a result of the investigation. This may include corrective actions, disciplinary actions, or any steps taken to address the concern raised.

Action Taken:

____
____
____
____
____

6. Recommendations

Provide any recommendations for further action to prevent recurrence of the issue or to improve company policies or procedures.

Recommendations:

____
____
____
____
____

7. Acknowledgment and Report Submission

By signing below, I confirm that I have completed this investigation report based on the findings and information available. This report is submitted for review and further action as necessary.

Investigation Lead Name: _________________________________

Investigation Lead Signature: ______________________________

Date: ____

For Internal Use Only:

Report Reviewed by: ____

Date of Review: ____

Final Action(s) Taken: ___________________________________

WHISTLEBLOWER FEEDBACK FORM

Confidentiality Notice:

This form is to be used by individuals who wish to provide feedback regarding the whistleblowing process, including their experience with the healthcare provider's whistleblowing system. All information will be treated confidentially and in accordance with company policies.

1. Whistleblower Details

Full Name (Optional): ____

Department/Unit (Optional): ____

Email Address (Optional): ____

Phone Number (Optional): ____

2. Feedback on Whistleblowing Process

Please provide feedback on your experience with the whistleblowing process. Was the process easy to follow? (Yes/No): ________

Please explain your answer: ____
____
____
____
____

3. Confidentiality and Anonymity

Did you feel that your identity was kept confidential throughout the process? (Yes/No):________ Please explain your answer: ____
____
____
____
____

4. Timeliness of Response

Were you satisfied with the timeliness of the response to your concern? (Yes/No): ________ Please explain your answer: ____
____
____
____
____

5. Outcome of the Whistleblowing Process

Were you satisfied with the outcome of your concern? (Yes/No): ________

Please explain your answer:

____
____
____
____
____

6. Suggestions for Improvement

Please provide any suggestions on how we can improve the whistleblowing process for future use.

Suggestions:
____
____
____
____
____

7. Acknowledgment and Feedback Submission

By signing below, I confirm that the feedback provided is accurate and based on my experience with the whistleblowing process.

Feedback Provider Name: ________________________________

Feedback Provider Signature: _____________________________

Date: ____

EXTERNAL WHISTLEBLOWING REPORTING FORM (EXTERNAL AGENCIES)

Confidentiality Notice:

This form is intended for external individuals or agencies wishing to report a concern related to misconduct or wrongdoing within a Primus PLUS Healthcare's operations. The information will be kept confidential to the fullest extent permitted by law, in accordance with the healthcare provider's policies and procedures.

1. Reporting Party Details

Full Name (Optional): ____

Organization/Agency (Optional): ____

Position (Optional): ____

Email Address (Optional): ____

Phone Number (Optional): ____

2. Nature of the Concern

Please provide a description of the concern you are reporting.

What is the nature of the issue or misconduct?

Nature of Concern: ____

3. Date(s) and Location(s) of Incident

Date(s) of Incident(s): ____

Location(s) of Incident(s): ____

4. Persons or Department(s) Involved

Please provide the names and positions of individuals or departments involved in the reported concern.

Persons or Departments Involved:

____

5. Evidence Supporting the Concern

Please provide any documents, recordings, or other evidence that supports the concern you are reporting.

Type of Evidence (e.g., document, recording, witness statements): _______

Evidence Description:

____
____
____
____
____

6. Previous Actions Taken

Have you previously reported this concern to anyone within the organization? (Yes/No): _______

If yes, with whom and when?

____
____
____

7. Acknowledgement of Reporting Procedure

By submitting this form, you acknowledge that you have read and understood the healthcare provider's whistleblowing policy and procedures. You also acknowledge that you understand that retaliation against individuals reporting in good faith is prohibited.

Signature (Optional): ______________________________________

Date: ______________________________________

For Internal Use Only:

Report Received by: ______________________________________

Date of Receipt: ______________________________________

Action Taken/Investigation Initiated: ____________________________

Assigned Investigator(s): ______________________________________

Investigation Status: ______________________________________

Follow-up Date: ______________________________________

RECORD OF RETALIATION

Confidentiality Notice:

This form is intended to document any incidents of retaliation related to whistleblowing within the Primus PLUS Healthcare All information will be kept confidential to the fullest extent permitted by law, in accordance with the company's policies and procedures.

1. Reporting Party Details

Full Name (Optional): ____

Department/Unit (Optional): ____

Position (Optional): ____

Email Address (Optional): ____

Phone Number (Optional): ____

2. Details of Retaliation Incident

Please provide a description of the retaliation incident. Include information regarding the nature of the retaliation, when it occurred, and who was involved.

Nature of Retaliation:

____
____
____
____
____

3. Date(s) and Location(s) of Retaliation

Date(s) of Retaliation: ____

Location(s) of Retaliation: ____

4. Individuals Involved in Retaliation

Please provide the names and positions of individuals involved in the retaliation incident.

Individuals Involved:

____
____
____
____
____

5. Actions Taken to Address Retaliation

Please describe any actions you have taken to report or address the retaliation incident.

Actions Taken:
____
____
____

____
____

6. Outcomes or Responses to Retaliation

Please provide any outcomes or responses from the healthcare provider regarding the retaliation incident.

Outcome/Response:
____
____
____
____
____

7. Additional Information or Evidence

Please provide any additional information or evidence to support the retaliation claim.

Additional Information:

____
____
____
____
____

8. Acknowledgment and Report Submission

By signing below, I confirm that the information provided is accurate and based on my knowledge and experience regarding the retaliation incident.

Name of Reporting Individual: _______________________________

Signature: _______________________________________

Date: _______________________________________

For Internal Use Only:

Report Reviewed by: ____

Date of Review: ____

Action Taken/Investigation Initiated: ______________________________

Assigned Investigator(s): ____

Investigation Status: ____

Follow-up Date: ____

REFERENCES

- **Care Quality Commission (CQC)**, 2021. *Regulations and Standards for Healthcare Providers*. Available at: https://www.cqc.org.uk [Accessed 23 December 2025].
- **Enterprise and Regulatory Reform Act 2013**. Chapter 24, *Public Interest Disclosure Act 1998: amendments to the Employment Rights Act 1996*. London: HMSO.
- **Financial Conduct Authority (FCA)**, 2020. *Whistleblowing Guidance*. Available at: https://www.fca.org.uk [Accessed 23 December 2025].
- **General Data Protection Regulation (GDPR)**, 2018. *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data*. Official Journal of the European Union, L 119/1.
- **Health and Safety Executive (HSE)**, 2021. *Whistleblowing in the Workplace: Health and Safety Concerns*. Available at: https://www.hse.gov.uk [Accessed 23 December 2025].
- **Health and Safety at Work Act 1974**, *c. 37*. London: HMSO.
- **Information Commissioner's Office (ICO)**, 2021. *Whistleblowing and Data Protection*. Available at: https://ico.org.uk [Accessed 23 December 2025].
- **Public Interest Disclosure Act 1998 (PIDA)**, *c. 23*. London: HMSO.
- **Serious Fraud Office (SFO)**, 2020. *Serious Fraud and Corruption Reporting*. Available at: https://www.sfo.gov.uk [Accessed 23 December 2025].
- **UK Government**, 2017. *Public Interest Disclosure: Code of Practice*. London: Department for Business, Energy & Industrial Strategy. Available at: https://www.gov.uk [Accessed 23 December 2025].