



**Superior
Healthcare
Group**

Whistleblowing Policy and Procedure

Version 2.0 – July 2025



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Important Notice

This is a controlled document and is only valid on the day it was accessed or printed. The latest version is available on Superior Healthcare's SharePoint site. For queries, contact: governance@superiorhealthcare.co.uk.

Accessible Formats

In accordance with the Accessible Information Standard, this policy is available in alternative formats upon request, including large print or easy read. Employees and clients who require information in a specific format should speak to their Nurse Manager, Coordinator or the Registered Manager.

1. Policy

1.1. Background

At Superior Healthcare, we promote a culture of openness, accountability, and continuous improvement. We recognise that employees are often the first to notice poor practice, wrongdoing, or risks to the safety of clients, colleagues, or the wider public.

This policy outlines our commitment to protecting whistleblowers and ensuring their concerns are taken seriously and investigated thoroughly, without fear of reprisal.

This policy aligns with:

- Public Interest Disclosure Act 1998 (PIDA)
- The Employment Rights Act 1996
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- CQC guidance on whistleblowing
- UK GDPR and the Data Protection Act 2018

It supports CQC Key Lines of Enquiry under the domains of Safe, Responsive, and Well-Led.

1.2. Policy Statement

Superior Healthcare will:

- Encourage and support our teams to raise genuine concerns without fear
- Investigate all whistleblowing concerns fairly and in a timely manner
- Take action where necessary to protect clients, employees and the public
- Protect whistleblowers from dismissal, victimisation, or any form of detriment

We will not tolerate any harassment or victimisation of individuals who raise concerns in good faith.

1.3. Purpose and Scope

This policy's aim is to:

- Ensure that all of our teams understand the importance of **raising a concern**, sometimes also referred to as '**speaking up**' or '**whistleblowing**'.
- Provide our employees and others working with us with a clear and safe way to report concerns about malpractice, wrongdoing, or risk in the workplace, and to ensure those concerns are addressed appropriately and fairly.

This policy applies to all our employees, agency workers, self-employed contractors, volunteers, students or apprentices, but also external stakeholders raising concerns in the public interest.

The Registered Manager and the Quality Assurance Manager have overall responsibility for the implementation of this policy.

1.4. Definitions

Employees at Superior Healthcare Group can report certain types of wrongdoing, usually something seen at work, though not always. The wrongdoing disclosed must be in the public interest – this means it must affect others, for example the general public.

Whistleblowing

The disclosure of information which relates to suspected wrongdoing or dangers at work.

Protected Disclosure

A disclosure made by a worker under Public Interest Disclosure Act 1998 (PIDA), meeting specific legal criteria and qualifying for protection from detriment.

1.5. Qualifying Disclosures

This procedure is intended to provide a safeguard to enable our teams to raise concerns about one or more of the following that has occurred, is occurring, or is likely to occur. These Qualifying Disclosures (see definition) mean that people can raise a concern about risk, malpractice or wrongdoing that they think is harming the services, might harm or has harmed in the past any aspect of the services that Superior Healthcare Group delivers.

A few examples of this might include (but are by no means restricted to):

It covers:

- Unsafe care
- Unsafe working conditions
- Inadequate induction or training for team members
- Lack of, or poor, response to a reported Client or Service User's safety incident
- Suspicions of fraud (which can also be reported to the local counter-fraud team)
- Damaging the environment, e.g. disposing of materials or waste incorrectly, for example, flushing medicines or syringes down the toilet or sink
- A bullying culture (across a team or organisation rather than individual instances of bullying)
- Criminal offence/s

- Falsification of timesheets, Client or Service User's records or other clinical or care records
- Failure to investigate claims of physical or sexual assault
- Physical, verbal or sexual abuse of any Client or Service User, colleague or other person on the premises of Superior Healthcare Group
- Breaching the Data Protection Act

NOTE: This policy should not be used for complaints relating to a team member's own personal circumstances, such as the way they have been treated at work. In those cases, the individual should use the Grievance Policy and Procedure; Anti-Bullying Policy or Procedure; or Harassment Policy and Procedure

2. Procedure

2.1. Freedom to Speak Up

All employees have a right and a duty to raise concerns regarding inappropriate behaviour, unlawful conduct, poor practice or behaviour to ensure standards of quality care.

Superior Healthcare Group has a **Freedom to Speak Up Guardian** who supports our team to speak up when they feel that they are unable to in other ways. Our Freedom to Speak Up Guardian is Jo Rychlik, Head of Quality and Governance. Jo's contact details are:

- Jo Rychlik, Head of Quality and Governance
Email: jorychlik@superiorhealthcare.co.uk
Phone: 07702 363969

2.2. How to Raise Concern

Step 1 – Line Manager

If a team member has a genuine concern about a risk, malpractice or wrongdoing at work, it is hoped that they feel they will be able to raise it first with their **Line Manager or Care Coordinator**. This may be done **verbally** or in **writing**.

- It is better to raise a concern **as soon as** it arises.
- Where possible, unless, for example, where the concern relates to a safeguarding matter, the concerns raised will be treated confidentially.
- Their line manager will inform them if they cannot keep the concern confidential.
- The Registered Manager has overall responsibility for concerns raised and the team member's line manager may need to share the concern with the Registered Manager or Senior Management.

Step 2 – Registered Manager

If a team member does not feel they can raise the concern with their line manager or care coordinator, or the concern relates to or involves the line manager (or they have raised it with the line manager and no action has been taken), the team member should escalate their concerns to **Registered Manager** or **Quality Assurance Manager** to deal with appropriately:

- Adele Hathorn, Head of Complex Care
Email: adelehathorn@superiorhealthcare.co.uk
Phone: 07706 299802
- Julie Moore, Quality Assurance Manager
Email: juliemoore@superiorhealthcare.co.uk
Phone: 07720 161983

Step 3 – Freedom to Speak Up Guardian

If the team member does not feel that the Registered Manager or the Quality Assurance Manager will appropriately handle their concerns, they may report their concerns directly to Jo Rychlik, the Freedom to Speak Up Guardian at Superior Healthcare Group, whose contact details are:

- Jo Rychlik, Head of Quality and Governance
Email: jorychlik@superiorhealthcare.co.uk
Phone: 07702 363969

Step 4 – By Email and via an Online Feedback Form

You can also raise a concern by:

- Emailing our Quality and Governance Team on concerns@superiorhealthcare.co.uk
- Completing a Feedback form on our website:
<https://www.superiorhealthcare.co.uk/contact-us/feedback/>
or
- By scanning the QR code in **Appendix 1** using your smartphone camera or QR scanner app

Step 5 – External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases it should not be necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for individuals to report their concerns to an external body such as a regulator (CQC). At Superior Healthcare, we strongly encourage our teams to seek advice before reporting a concern to anyone external.

However, if the team member does not feel that Superior Healthcare Group will appropriately handle their concerns, they may report their concerns directly to the Care Quality Commission on:

- Care Quality Commission (CQC)
Phone: 03000 616161
Email: concerns@cqc.org.uk
Web: <https://www.cqc.org.uk/give-feedback-on-care>

3. How we deal with Concerns

3.1. Investigation

The Registered Manager or an assigned Investigating Manager may arrange a meeting to discuss the concern. If so, the individual may bring a colleague or union representative to any meetings under this policy. The individual's companion must respect the confidentiality of the disclosure and any subsequent investigation.

The management team will have discretion over the nature of the investigation into concerns raised, including, where it is considered appropriate, the involvement of others such as Local Authority Safeguarding Team or Social Services. If there is evidence of criminal activity, the Police will be informed.

We cannot always guarantee the outcome the individual is seeking, however we will try to deal with the individual's concern in a fair and appropriate way. If the individual is not happy with the way in which the concern has been handled, they can raise it with one of the contacts listed above (please see Step 1 – Step 4 in Section 2).

3.2. Timescales and Outcome

The individual with whom the concern is raised will acknowledge the concern within locally agreed timescales and in line with best practice.

Where possible, the responsible manager will feed back to the team member who raised the concern on the outcome of any investigation, although this may not always be possible in full due to the nature of the disclosure.

3.3. Protected Disclosures and Safeguarding

Where a safeguarding concern is received, Kent County Council safeguarding policies and procedures will be followed. For more information please see our Safeguarding Policy and Procedure.

The Local Authority Safeguarding Team will take the responsibility of informing other agencies, however if an official safeguarding referral is made, we would also inform the CQC and, where relevant, our commissioner. The contact details for the Local Authority Safeguarding Team are as follows:

- Kent County Council – Social Services
Email: social.services@kent.gov.uk
Phone: 03000 41 61 61

4. False, Malicious and Vexatious Allegations

Superior Healthcare Group is committed to thoroughly investigating all whistleblowing concerns raised. We trust that individuals who speak up do so with genuine intentions.

No team member will face disciplinary action for raising a concern in good faith, whether or not it is upheld, provided it is raised in line with this policy or in accordance with the Public Interest Disclosure Act 1998 (PIDA).

However, raising a concern maliciously, knowingly providing false information, or using the whistleblowing process for personal gain or to cause harm to others, is unacceptable. Where such behaviour is identified, it may result in disciplinary action being taken.

5. Protection and Support for Whistleblowers

5.1. Protection and Support

Superior Healthcare Group recognises that speaking up can feel daunting, and we are committed to ensuring that all team members feel safe and supported when raising concerns. We actively encourage openness and reassure all teams that they will be protected from any negative consequences when raising concerns in good faith, even if those concerns turn out to be unfounded.

No individual will suffer any form of detriment as a result of whistleblowing. This includes, but is not limited to, dismissal, disciplinary action, intimidation, or any other unfavourable treatment linked to the concern being raised. If a team member believes they have been treated unfairly after raising a concern, they should report this to the Registered Manager without delay. If the issue is not resolved, it should be escalated formally through the grievance procedure.

Any employee found to have retaliated against or threatened a whistleblower will face disciplinary action, which may include dismissal.

Further Support

If a team member would like independent and confidential advice before raising a concern, they are encouraged to contact the following organisations:

- The Whistleblowing Helpline for NHS and Social Care (Speak Up):
Email: england.speakup1@nhs.net
Phone: 0300 311 22 33
- Protect (Formerly Public Concern at Work) - A whistleblowing charity:
Email: info@protect-advice.org.uk
Phone: 020 3117 2520
Web: www.protect-advice.org.uk

5.2. Our Commitment

Superior Healthcare Group is committed to fostering a culture where concerns can be raised without fear of victimisation, harassment or reprisal. We recognise our responsibility to take all reasonable steps to prevent

the victimisation of individuals who speak up. To support a transparent, safe and respectful working environment, we will:

- Fully implement and adhere to our Whistleblowing Policy
- Promote a culture of openness, honesty and accountability
- Ensure the policy is clearly communicated to all team members
- Provide appropriate training to help employees understand their rights and responsibilities
- Take prompt and proportionate action against any individual who bullies, harasses or retaliates against a whistleblower

We will not tolerate any form of retaliation against those who raise concerns in good faith, and we are committed to protecting and supporting individuals throughout the process.

6. Monitoring, Review and Continuous Improvement

At Superior Healthcare Group, we are committed to embedding a culture of continuous improvement, openness, and learning. Through our Good Governance and Quality Assurance frameworks, we maintain robust audit and review processes that help us monitor the effectiveness of our policies and uphold the highest standards of care and accountability.

We actively seek and value feedback from all stakeholders, particularly from individuals who may face barriers to speaking up. By listening, learning, and acting on feedback, we aim to improve our practices, strengthen trust, and ensure that concerns are raised and addressed in a supportive and inclusive environment.

7. Related Documents

- Grievance Policy and Procedure
- Anti-Bullying and Harassment Policy and Procedure
- Safeguarding Policy and Procedure
- Complaints Policy and Procedure

8. Key Contacts

- Adele Hathorn – Registered Manager: adelehathorn@superiorhealthcare.co.uk
- Julie Moore – Quality Assurance Manager: juliemoore@superiorhealthcare.co.uk
- Jo Rychlik – Freedom to Speak Up Guardian: jorychlik@superiorhealthcare.co.uk
- Stewart Thorp – CEO: stewartthorp@superiorhealthcare.co.uk

Appendix 1 – QR Code

You can raise a Concern by scanning the below QR code using your smartphone camera or QR scanner app to instantly access our Feedback form.

