



Group Whistleblowing Policy

THE STANDARD OPERATING PROCEDURE FOR EACH DIVISION SHOULD BE READ WITH THIS POLICY

Policy

The policy has been approved by CareTech and applies to the Company and all its direct and indirect subsidiaries. Any reference to the “Company” includes all of these entities.

This policy ensures that the Company complies with the Public Interest Disclosure Act 1998 (PIDA) and the relevant provisions of the Employment Rights Act 1996.

It applies to all employees, foster parents, consultants, contractors, volunteers, interns, casual workers and agency workers.

This policy does not form any part of any employee’s contract of employment and the Company may amend at any time.

This policy is used for disclosures about matters other than what could be considered a personal grievance (for example, a matter regarding your contract of employment) If you are not sure where your complaint or issue would be appropriately addressed, then you should speak to your Line Manager or a member of the HR team, you can also seek advice from Protect (Formerly Public Concern at Work)

The Company will ensure that the whistleblowing process is referred to and instruction is provided within training courses on how to raise concerns. Whistleblowing is covered within the Company’s training on Safeguarding, in e-learning modules and is incorporated into safeguarding workshops and induction courses.

Purpose

We, CareTech (The Company), are committed to conducting our business with the highest standards of honesty and integrity, and we expect all colleagues to maintain high standards in accordance with the Professional Boundaries and Conduct Policy.

Our primary loyalty at all times should be to those who use our services, and there is therefore a responsibility on every employee to report any conduct that is of concern. It is important to the Company that any fraud, misconduct, or wrongdoing by employees, at any level is reported and properly dealt with. The Company therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. This policy

sets out the way in which individuals may raise any concerns that they have and how these concerns will be dealt with.

The aims of this policy are:

- To encourage all employees to report suspected wrongdoing as soon as possible, in the knowledge that concerns will be taken seriously, investigated appropriately and that confidentiality will be respected wherever possible.
- To provide employees with guidance on how to appropriately raise such concerns.
- To reassure employees that they can raise a genuine concern without fear of reprisal, even if the concern turns out to be mistaken.
- To assure relatives, parents/guardians, placing authorities and inspection and registration bodies that the Company gives high priority to securing the highest standards of behavior from and amongst its employees.

It is made available to parents, carers, employees and individuals.

Background

The law provides protection for employees who raise legitimate concerns about specific matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by an individual who has reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health & safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealment of any of the above;

is being, has been, or is likely to be, committed. The individual does not have to provide proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient, although you will need to demonstrate to the person contacted that there are sufficient grounds for your concern. It is the Company's responsibility to ensure that an investigation takes place.

A whistleblower is a person who raises a genuine concern relating to any of the above. For example;

- suspicions or concerns regarding any type of abuse or potential harm to individuals in our care or employees, which for some reason cannot be raised under the normal safeguarding procedures and as set out in our Child Protection and Safeguarding Policy;
- criminal activity;
- failure to comply with any legal or professional obligation or our regulatory requirements;

- danger to health and safety;
- bribery under our Anti-Bribery and Corruption Policies;
- dishonesty, fraud or financial mismanagement;
- breach of our internal policies and procedures including our Code of Conduct;
- unauthorised disclosure of confidential information;
- issues that are not being dealt with through clinical governance reviews or other legitimate avenues and;
- if you believe someone is covering up wrongdoing.

This list is not exhaustive.

Certain conditions must be met for a whistleblower to qualify for protection under the legislation. You must make a protected disclosure, and this has three main elements;

1. You must provide information of a concern that you “reasonably believe” shows a category of wrongdoing set out in the law.
2. You must reasonably believe that the concern is in the public interest*
3. You must raise your concern in accordance with the law – either internally to your employer or externally to an outside body.

*Public Interest would usually be a concern about wrongdoing which affects people other than just themselves, it would fall in the public interest. This can be distinguished from cases where the employee is going through a personal issue at work or where employment law rights are affected, making it more of a grievance matter. However, there may be instances where a concern may also affect the employee making it, for example if there is a culture of bullying or discrimination in the workplace, which would make this a public interest concern.

We consider it is everyone’s responsibility to carry out their duty to the highest standards of openness and accountability. **If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern), you should report it under this policy.**

Any employee who makes such a protected disclosure has the right not to be dismissed, subject to any other detriment, or victimised because they have made a disclosure. The Company will not tolerate ill treatment of any sort to anyone raising such a concern, and in this event` the matter will be dealt with under the formal disciplinary procedure.

Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing in the workplace. Employees must be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly, and confidentially, and the outcome of the investigation, where

possible, will be reported back to the individual who raised the issue. This may not always be possible in full due to the nature of the disclosure.

- No employee or otherwise will be victimised or receive detrimental treatment including discrimination, disadvantage, loss of opportunity or retaliation as a result of raising a matter under this process. This means that continued employment and opportunities for future promotion or training will not be prejudiced in any way because they have raised a legitimate concern.
- Victimisation of an employee for raising a qualified or protected disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure it will be dealt with in accordance with the Company's disciplinary procedure, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.

Wherever the Company's formal disciplinary process is invoked this could result in a formal sanction up to and including dismissal.

An instruction to cover up wrongdoing itself is a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority or Senior position in the Company, employees should not agree to remain silent.

Safeguarding

Where a safeguarding concern is received, this shall be dealt with under the relevant service's Safeguarding policy and procedure. **Employees have a responsibility to report all safeguarding concerns immediately using the appropriate internal process to ensure the safety of those we care for.**

Raising a safeguarding concern through safeguarding procedures does not prevent an individual from making a whistleblowing disclosure where they believe safeguarding concerns have not been appropriately addressed, where there has been a failure of process, where concerns have been deliberately concealed, or where a culture exists that discourages reporting.

Concerns regarding the conduct of adults working with children, young people or vulnerable adults may also require referral to the relevant Local Authority Child Protection/Safeguarding team in accordance with local safeguarding procedures.

Procedure – follow the Standard Operating Procedure for your Division

How to raise a whistleblowing concern

If an employee has a concern, it is expected that in the majority of cases you would be able to raise this with your Immediate Line Manager. If you feel your Line Manager is involved, or is not available, then you should contact the next level of Management such as Regional/Locality Manager or Lead, or the Managing Director of your division.

If you are not employed by CareTech you can follow your organisations procedures and also raise concerns with either the service manager or most senior person on shift. Also note the contact list at the end of this policy

This may be done verbally or in writing. Writing is preferred to ensure all of your concerns are captured accurately and you should endeavor to provide as much detail as possible. Your Manager may be able to agree a way of resolving your concern quickly and effectively. Your manager should make a written record of your concern, and ensure that it is properly investigated, feeding back to you as appropriate.

In **all cases** the manager must refer any Whistleblowing concerns or reports to the relevant Divisional Head of Human Resources, or the other Whistleblowing Officers so that a complete record of all such concerns and the action taken and outcomes, is recorded. If the whistleblowing incident concerns a procurement or financial irregularity, the Chief Finance Officer (CFO) and Group Financial Controller will also be notified in the first instance.
(follow the standard operating procedure for your division).

Where the matter is more serious or you feel that your line manager has not addressed your concern, or you prefer not to raise it with someone within the Company for any reason, you should contact our confidential independent external telephone hotline, on **0800 086 9128** (a Freephone number). This hotline is run on a 24hours, seven days a week basis by Navex Global, an independent specialist provider of whistleblowing services. Alternatively, you can contact Navex Global EthicsPoint online service and record your concerns using their secure on-line portal at **caretech.ethicspoint.com**.

EthicsPoint will take down a written summary of your concern and read this back to you to ensure that they have accurately recorded your concerns. EthicsPoint will then notify the Company Whistleblowing Officers that a concern has been raised with them by secure e-mail.

During normal working days, the whistleblowing officer will gain acknowledgement of any notification on the same working day. If this acknowledgment is not received, this will be escalated by the whistleblowing officer. Appropriate operational staff working with HR, will ensure that an investigation takes place if appropriate, and that all safeguarding procedures are adhered to. (see divisional SOP)

Confirmation of acknowledgment of receipt will also be sent back to the Whistleblower. After you have completed your report you will be assigned a unique code called a 'report key'. You will need to write down your report key and password and keep them in a safe place. After 5-6 business days you will be able

to use your report key and password to check your report for feedback or questions.

Whether an individual raises a concern confidentially, via EthicsPoint, with their line manager or in any other fashion, the Company's investigation and response time will be consistent and the Company will be accountable for the same level of response. If a concern is deemed to be more appropriately managed via another policy such as Grievance, the complainant will receive confirmation and appropriate advice and support on how to take it forward under the correct procedure.

It is expected that an individual should raise concerns via the ways outlined above, however should an individual feel unable to raise a concern within the forums highlighted above, they are also able to raise concerns directly with their regulatory body.

Confidentiality

Whichever route you use to raise your concern, we hope you will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity confidential. This may not always be possible to ensure a full and fair investigation process, and we will notify you accordingly if this is the case.

We do not encourage colleagues to make disclosures anonymously. Thorough investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish the credibility of allegations. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Divisional Head of Human Resources or one of the other Whistleblowing Officers, and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Protect, an independent whistleblowing charity who offer a confidential helpline for individuals who are thinking of whistleblowing. Their contact details are set out in section 1 of this Policy.

The Company has a duty to pass on information to others if this is required as a matter of law or in the public interest. On occasion this may mean that this cannot be done without identifying the person who raised the concern, for example:

- Because evidence is needed in court; or
- The Company is involved in legal proceedings and Company papers are open to scrutiny. If this happens, the Company will discuss this with the employee beforehand.

Management of Concerns

The Company will acknowledge, assess, investigate and respond to whistleblowing concerns promptly and proportionately. Detailed processes, responsibilities,

escalation arrangements and indicative timescales are set out within the relevant Divisional Whistleblowing Standard Operating Procedure.

All whistleblowing incidents, regardless of the route, are sent to the Divisional Head of Human Resources. Operational leaders will nominate an investigator or team of investigators with relevant experience and specialist knowledge of the subject matter. The relevant Managing Director will also be notified in the first instance, unless they are directly implicated. If a Whistleblowing concern has been raised directly with the regulator or any other external body, and this is passed back to Operations, it must also be reported immediately to the relevant Whistleblowing Officers for the appropriate division.

Conflict of Interest Escalation

Where concerns relate to a Director, Human Resources Lead, Whistleblowing Officer, Executive Leader or Board Member, the concern must be escalated to an alternative senior officer who is independent of the matter being investigated.

Where necessary, concerns may be referred directly to the Group Executive Director, Chief Executive Officer, Group Executive Chair, external legal advisers or regulatory authorities to ensure impartiality and transparency.

Keeping you Informed

We will seek to inform you as soon as possible and in any event within 20 working days of either the outcome of our assessment or how the investigation is progressing. If you have raised a concern through the EthicsPoint hotline, you may be asked to provide further information from time to time. After 5-6 business days you will be able to use your report key and password to log back into the system and check your report for feedback or questions.

The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

Outcome Categories

Investigation findings will normally be recorded using one of the following classifications:

- Substantiated
- Partially substantiated
- Unsubstantiated

- Inconclusive
- Malicious or False

The outcome category will be used to support organisational learning, monitoring and reporting.

Malicious or False Allegations

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to investigation which may result in a disciplinary sanction. In certain cases, malicious or false allegations could give rise to legal action on the part of the persons complained about.

If the nature of the concerns warrants, it may also be:

- be referred to the Police
- Be referred to the appropriate regulatory body
- form the subject of an independent inquiry

If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other Whistleblowing Officers.

You can also contact **Protect**, they are the independent authority on public interest whistleblowing). They offer free advice to individuals with whistleblowing dilemmas.

If on full completion of the process, you reasonably believe that the appropriate action has not been taken, you should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include;

- HM Revenue & Customs;
- the Financial Conduct Authority;
- the Competition and Markets Authority;
- the Health and Safety Executive;
- the Environment Agency;
- the Independent Office for Police Conduct; and
- the Serious Fraud Office.

External disclosures

Whilst we hope this policy gives our employees the reassurance they need to raise any concerns internally, we recognise that there may be circumstances where you

can properly report a concern to an outside body. We would prefer you to raise a matter with an appropriate regulator than not at all.

It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting any concern externally. Protect also offer a confidential helpline and have a list of prescribed regulators for reporting certain types of concern.

Data protection

When an individual makes a disclosure, the Company will process any personal data collected in accordance with its Data protection Policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Records relating to whistleblowing concerns, investigations and outcomes will be maintained securely and retained in accordance with the Company's Records Management Policy.

Accountability

The Whistleblowing officers, whose details are set out below, have day to day operational responsibility for this policy and must ensure that all employees who may deal with concerns or investigations under this policy receive regular and appropriate guidance on its use.

All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

Governance, Oversight and Assurance

The Company will maintain oversight of whistleblowing activity through regular governance reporting. Anonymised information relating to whistleblowing concerns, investigation outcomes, themes, trends, lessons learned and actions taken will be reported to the Senior Leadership Team and the relevant Board, Audit Committee or Governance Forum at least annually, and more frequently where significant risks are identified.

The purpose of this oversight is to ensure organisational learning, monitor culture, identify recurring issues, and provide assurance that concerns are investigated appropriately and resolved effectively.

Freedom to Speak Up

On occasion, an employee may feel reluctant to utilise the Whistleblowing procedure. Whilst the Company provides full assurance that this process will not result in any form of detrimental treatment towards anyone who uses it, we would also like to point out the availability of the Group Freedom to Speak Up Guardian.

Monitoring and Learning

The Company will monitor whistleblowing concerns to identify themes, trends, recurring risks and opportunities for improvement. Monitoring information may include:

- Number of concerns raised.
- Nature and category of concerns.
- Safeguarding-related concerns.
- Regulatory concerns.
- Investigation outcomes.
- Time taken to investigate.
- Actions implemented.
- Lessons learned.

Learning arising from whistleblowing investigations will be shared, where appropriate, to improve safeguarding, quality, governance and organisational culture.

Linked Policies

Grievance Policy

Disciplinary Policy and Procedure

Harassment and Bullying Policy and Procedure

Anti-bribery and Corruption

GDPR

Wills Gifts and Legacies Policy

Legislative Framework and Guidance

This policy is in line with:

- [Keeping children safe in education - GOV.UK](#)
- [Working together to safeguard children - GOV.UK](#)
- [Keeping Learners Safe](#)
- [Children's homes regulations, including quality standards: guide - GOV.UK](#)

- [Social Services and Well-being \(Wales\) Act 2014](#)
- [Safeguarding Wales](#)
- [Health and Social Care Act 2012](#)
- [the-national-minimum-standards-for-independent-health-care-services-in-wales-2011-no-16.pdf](#)
- [The Independent Health Care \(Wales\) Regulations 2011](#)
- [Social Services and Well-being \(Wales\) Act 2014](#)
- [Sir Robert Francis' Freedom to Speak Up review - GOV.UK](#)
- [Prevent duty guidance: England and Wales \(2023\) - GOV.UK](#)
- [Public Interest Disclosure Act](#)
- [Employment Rights Act 1996](#)

*all accessed July 2026

Contact Details

Whistleblowing Hotline (24 hours)	EthicsPoint	0800 086 9128 Navex Global EthicsPoint Website www.caretech.ethicspoint.com
Group Freedom to Speak Up Guardian	Sarah Palmer Executive Director of Compliance and Regulation (Adults)	Sarah.palmer@caretech-uk.com 07467 954 433
Whistleblowing Officers	Divisional Head of Human Resources (Children's)	Julie.birtwistle@caretech-uk.com 07929 042 2220
	Performance Improvement Director	Tom.burford@caretech-uk.com 07711 765 786
	Group Executive Director of Human Resources	Steve.bennett@caretech-uk.com 07336 621 114
	Executive Director of Compliance and Regulation (Adults)	Sarah.palmer@caretech-uk.com 07467 954 433
	Divisional Head of Human Resources (Adults)	Sarah.stennett@caretech-uk.com 07586 971 333

Protect	Formerly public concern at work PCaW	0203 1172520 www.protect-advice.org.uk
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Social Care Wales

About matters relating to the registration of social care workers in Wales.

<https://socialcare.wales/registration>

Care Inspectorate Wales

[Contact us | Care Inspectorate Wales](#)

Telephone: 0300 7900 126

Email: ciw@gov.wales

Welsh Government office

Sarn Mynach

Llandudno Junction

LL31 9RZ

Healthcare Improvement Scotland

About matters relating to furthering the improvement in quality of health care in Scotland.

Healthcare Improvement Scotland

Gyle Square

1 South Gyle Crescent

Edinburgh EH12 9EB

Tel: 0131 623 4300

Email: comments.his@nhs.net

www.healthcareimprovementscotland.org

Care Quality Commission

About the provision of adult social care services in England.

CQC National Customer Service Centre

Citygate

Gallowgate

Newcastle upon Tyne NE1 4PA

Tel: 03000 616161

www.cqc.org.uk

Health and Care Professions Council

About matters relating to the registration and fitness to practice of health and care professional.

Email - ftp@hcpc-uk.org <http://www.hcpc-uk.org/>

His Majesty's Chief Inspector of Education, Children's Services and Skills (the Chief Inspector)

About matters relating to regulation and inspection of establishment and agencies for children's social care services.

Ofsted

Piccadilly Gate

Store Street

Manchester M1 2WD

Tel: 0300 123 3155

[Email: whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

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