

Doctor Care Anywhere Policy

Whistleblowing Policy

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| Document Title: Whistleblowing Policy | | Document REF / ID: GRC-P-005 |
| DCA Information Classification: SHL_CONFIDENTIAL | | Audience: All Doctor Care Anywhere staff |
| Document Owner: Martina Usher Wright | | Authoriser/Approved By: Audit & Risk Committee |
| Version: 1.1 | Date Published: 01-JAN-2023 | Next Review Date: 01-JAN-2025 |
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1 INTRODUCTION

It is vitally important that all Doctor Care Anywhere (DCA) staff feel able to voice any concerns they have at work. Raising concerns helps DCA to keep improving its services for patients, and the working environment for staff. DCA understands that staff may feel worried about raising a concern. The aim of this policy is to make it as easy as possible for staff to raise concerns, to support them when they do, and to reassure them of the steps the organisation will take to make sure their concerns are listened to, taken seriously, and addressed.

People who blow the whistle have special protection under the law. This policy describes how whistle-blowers will be supported.

2 PURPOSE & AUDIENCE

DCA Group PLC and its subsidiaries are committed to fostering a culture of compliance, ethical behaviour, and good corporate governance. DCA values excellence, integrity, unity, innovation, and patient centred behaviours and wishes to encourage a culture where any officer, employee or contractor does not suffer detriment because of speaking up about potential misconduct concerns. This policy has been adopted to provide a safe and confidential environment for people to raise any such concerns without fear of reprisal.

This policy sets out:

- when you will be protected for speaking up about misconduct.
- the protections that will be provided to you if you speak up; and
- how disclosures made under this policy will be handled by DCA.

All officers, employees, and contractors of DCA, wherever they are based, must comply with this policy.

Officers and employees of DCA based in the United Kingdom (**UK**) may also be subject to additional local whistleblowing requirements in the country in which they are based.

Whistleblowing law is in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). It provides the right for a worker to take a case to an employment tribunal if they have been victimised at work or lost their job because they have 'blown the whistle'.

This policy also protects those who are entitled to whistleblowing protection under the Australian whistleblowing laws 2019 Treasury Laws Amendment (enhancing Whistleblowing Protections) Act (see section 10 of this policy).

3 SCOPE AND WHO MAY MAKE A PROTECTED DISCLOSURE

You may make a disclosure that qualifies for protection under the Australian whistleblowing laws if you are or were, an officer or employee of DCA, including permanent, part-time, fixed term or temporary employees or interns, and secondees:

- a DCA contractor or supplier of goods and services to DCA (whether paid or unpaid) (for example, consultants, service providers and business partners), including an employee of such a contractor or supplier.

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- an associate of DCA; or
- a parent, grandparent, child, grandchild, sibling, spouse or dependent of any of the above.

You may make a disclosure that qualifies for protection under the laws of the UK if you are or were:

- an employee or worker of DCA, including permanent, part-time, fixed term or temporary employees, or workers and secondees (but not including volunteers).
- a non-employee undergoing training or work experience as part of a training course; or
- an agency worker (e.g., supplied by a third-party temping agency)

4 DEFINITIONS

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to organisation activities. This includes bribery, fraud, or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

5 ROLES AND RESPONSIBILITIES

The table below includes high level roles and responsibilities related to this policy:

| ROLE | RESPONSIBILITY |
|--|---|
| CEO | Is the nominated Board sponsor for the Whistleblowing Policy and procedure across DCA, ensuring that all concerns raised are dealt with fairly, thoroughly and in accordance with this policy. |
| Whistleblowing Managers (Chairman of ARC & CRO) | <ul style="list-style-type: none"> • Responsible for collating details of all cases which are dealt with under this policy and will provide aggregated reports to the Audit Risk Committee and if required the Board on a quarterly basis. • Responsible for preparing and presenting an annual report to the Board. Reports will outline the nature of the concern and the outcome in a form that does not endanger the individual's confidentiality • Manage the relationship with the external independent organisation providing the confidential reporting line |
| Managers | All managers are responsible for ensuring that staff are aware of this policy and its application, and for creating an environment in which staff can express concerns freely and without fear of reprisal. |
| All Staff | The individual has a responsibility to raise concerns providing they have a reasonable belief that malpractice and/or wrongdoing has occurred. |

6 WHAT MAY A PROTECTED DISCLOSURE BE ABOUT?

Disclosures do not have to be about breaking the law. Disclosures may be about misconduct or an improper situation or circumstances in relation to DCA (including by a DCA officer or employee) where you have reasonable grounds to suspect has occurred or is occurring in relation to DCA.

Disclosures **solely** about a personal work-related grievance are **not** covered by this policy and do **not** qualify for protection under the whistleblowing laws unless they also relate to any detriment or threat of detriment by

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reason of you making or being suspected of making a protected disclosure (see section 0 for examples of “detriment”).

Examples of disclosable matters

Some examples of matters that qualify for protection under the Australian whistleblowing laws are:

- conduct that amounts to a criminal offence or contravention of the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth) with amends in the *Corporations Act 2001* (Cth) or *Australian Securities and Investments Commission Act 2001* (Cth);
- conduct that is a Commonwealth criminal offence punishable by more than 12 months imprisonment.
- illegal conduct, such as theft, dealing in, or use of, illicit drugs, actual or threatened violence, corruption, bribery, criminal damage to property or breaches of work health and safety laws.
- fraud, money laundering or misappropriation of funds.
- negligence, default, breach of trust or breach of duty.
- any conduct that may indicate a systemic issue in relation to DCA.
- conduct relating to business behaviours and practices that may cause consumer or patient harm.
- conduct that represents a danger to the public or the financial system.
- information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system.
- misconduct in relation to DCA’s tax affairs.
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made, or be planning to make, a disclosure; or
- the deliberate concealment of any such matter.
- matters that qualify for protection under the laws of the UK (Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998) must be **made in the public interest** and tend to show one or more of the types of wrongdoing or failure listed below:
 - criminal offences.
 - breach of any legal obligation.
 - miscarriages of justice.
 - danger to the health and safety of any individual.
 - damage to the environment; and
 - the deliberate concealing of information about any such matter.

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Personal work-related grievances

A personal work-related grievance means a grievance about any matter in relation to your employment or former employment that has, or tends to have, implications only for you personally. Examples of a personal work-related grievance include (but are not limited to):

- an interpersonal conflict between you and another employee.
- a decision that does not involve a breach of workplace laws.
- a decision about your engagement, transfer, or promotion.
- a decision about your terms and conditions of engagement, payroll, or remuneration; or
- a decision to suspend or terminate your engagement, or otherwise discipline you.

If your disclosure is a **solely** personal work-related grievance,

should make it in accordance with our Grievance Policy which can be accessed via the Intranet.

Reasonable grounds to make the disclosure

You may still qualify for protection if your disclosure turns out to be incorrect, but you must have reasonable grounds for suspecting that the information you are disclosing concerns misconduct or an improper situation or circumstances in relation to Doctor Care Anywhere.

A disclosure made without reasonable grounds (such as where you know it to be false) may amount to misconduct and be subject to disciplinary action.

7 WHO MAY RECEIVE A PROTECTED DISCLOSURE?

All the people listed in this section may receive disclosures that qualify for protection under the Australian and UK whistleblowing laws.

If you prefer, you may instead make a disclosure to an internal or external auditor¹ (including a member of an audit team conducting an audit on DCA).

DCA's registered tax agent or BAS agent², if the disclosure concerns DCA's tax affairs or the tax affairs of an associate of DCA, or an officer or employee at DCA who has functions or duties relating to its tax affairs and who you consider may be assisted in their role by knowing that information.

In respect of disclosures made in the UK, there are some circumstances in which you may make a disclosure to someone other than DCA, but only as provided for under the whistleblowing laws of the UK. You should take independent legal advice before taking any steps to make a disclosure in the UK to anyone other than DCA.

¹ Doctor Care Anywhere's external auditor is Grant Thornton.

² Doctor Care Anywhere's tax agent is Grant Thornton.

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8 HOW MAY A PROTECTED DISCLOSURE BE MADE?

DCA has implemented an external service working in partnership with Safecall who will provide a professional, independent, external, and confidential means for all individuals to report their concerns.

You can call Safecall on **0800 915 1571** at any time. Alternatively, Safecall can be contacted via the web www.safecall.co.uk/report .

Safecall is an independent external reporting line where you may raise your concerns and be assured, they will be fully addressed. All calls are treated with utmost confidentiality by independent staff who will, should you wish for whatever reason, not disclose your name to DCA.

Please note that Safecall is an additional service and does not replace other company policies and procedures already in place. You may make your disclosure anonymously (and stay anonymous throughout and after any investigation) and still qualify for protection under the Australian or UK whistleblower laws as appropriate.

You may wish to obtain independent legal advice before making a disclosure. That communication with your legal adviser will also be protected under the Australian and UK whistleblower laws as appropriate.

9 LEGAL PROTECTIONS FOR DISCLOSERS

Confidentiality and secure record-keeping

All persons responsible for or involved in an investigation must take all reasonable steps to reduce the risk that a discloser will be identified.

DCA will do this by:

- obscuring your name and identifying features from any internal reporting about your disclosure (unless you agree for your identity to be known).
- referring to you in a gender-neutral context (unless you agree for your identity to be known).
- where possible, contacting you to help identify certain aspects of your disclosure that could inadvertently identify you.
- engaging qualified staff to handle and investigate disclosures.
- storing all material relating to disclosures securely.
- limiting access to all information to those directly involved in handling and investigating the disclosure; and
- ensuring that anyone who is involved in handling and investigating your disclosure is aware of the confidentiality requirements.

Identity protections and exceptions

If you make a protected disclosure, it is illegal for anyone to identify you or disclose any information that is likely to lead to you being identified, unless:

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- it is not possible to investigate the disclosure without disclosing information that might identify you (but all reasonable steps must be taken to protect your identity).
- it is necessary to obtain legal advice about your disclosure and the whistleblowing laws, in which case, we can pass the information on to our lawyer.
- we need to disclose the information to the Australian Federal Police; the Australian Securities and Investments Commission (**ASIC**), the Australian Prudential Regulatory Authority (**APRA**) or the Australian Taxation Office (**ATO**), if the disclosure concerns DCA's tax affairs or the tax affairs of an associate of DCA; or
- you consent to that disclosure.

You may lodge a complaint to a regulatory body, such as ASIC APRA or the ATO, if you believe that your confidentiality has been breached.

Provision of identity to a court or tribunal

No-one at DCA may disclose or produce to a court or tribunal any information or documents which disclose your identity (or information likely to lead to your identification) without seeking the advice of our external legal advisors.

If you make a protected disclosure and become aware that a court or tribunal has requested disclosure of your identity or production of documents containing your identity (or information likely to lead to your identification), you may apply to the court or tribunal for an order protecting your identity.

Protection from detriment

DCA is committed to protecting people who make disclosures under this policy.

It is against the law for anyone at DCA (including any officers, employees, or contractors) to cause or threaten any detriment to any person because that person:

- is or proposes to make a disclosure under this policy or the Australian whistleblowing laws; or
- is suspected or believed to have made a disclosure under this policy.

“**Detriment**” includes (but is not limited to):

- dismissal of an employee.
- injury of an employee in their employment.
- alteration of an employee's position or duties to their disadvantage.
- discrimination, harassment, or intimidation.
- harm or injury including psychological harm, damage to property, reputation or financial position.
- taking action against a person (including any disciplinary action or imposing a liability) for making a disclosure; or

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- threats of any of the above.

However, DCA is entitled to take steps that:

- are reasonably necessary to protect you from detriment (for example, moving you to another office to protect you from detriment if you have made a disclosure about your immediate work area); or
- relate to managing unsatisfactory work performance in line with DCA's performance management framework.
- You may seek independent legal advice or contact regulatory bodies, such as ASIC, APRA or the ATO, if you believe you have suffered detriment because of your disclosure.
- Similar rights and protections exist under the laws of the UK, in respect of protected disclosures to which those laws apply.

Protection from civil, criminal, and administrative liability

If you make a protected disclosure, you will also be protected from any of the following in relation to your disclosure:

- civil liability – for example, any legal action against you for breach of an employment contract, duty of confidentiality or another contractual obligation.
- criminal liability – for example, prosecution for unlawfully releasing information or unlawfully using your disclosure against you in a prosecution; and
- administrative liability – for example, disciplinary action for making a disclosure.

However, you may be liable for any misconduct that you have engaged in that is revealed by your disclosure (or revealed by an investigation following your disclosure).

Compensation and other remedies

You may seek compensation and other remedies through the courts if:

- you suffer loss, damage, or injury because of a disclosure; and
- DCA failed to take reasonable precautions and exercise due diligence to prevent detrimental conduct.

We encourage you to seek independent legal advice if you wish to seek compensation or remedies in court.

10 HOW THIS POLICY INTERACTS WITH AUSTRALIAN WHISTLEBLOWER LAWS

By making a disclosure in accordance with this policy, you may be protected under the Australian whistleblowing laws if the type of matter you disclose is protected by those laws.

While this policy principally deals with internal disclosures, the protections afforded by the Australian whistleblowing laws (set out in section 9) also include some types of disclosure made to external parties, such as:

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- legal representatives, to obtain advice or representation about the Australian whistleblowing laws.
- ASIC, APRA or the ATO; or

MPs or journalists, where you have reasonable grounds to believe that making the further disclosure would be in the public interest or the information concerns a substantial and imminent danger to the health or safety to one or more persons or to the natural environment, but **only if**:

- you previously made a disclosure of that information to either ASIC, APRA or another Commonwealth body prescribed by regulation; and
- you notified that body in writing of your intention to disclose to an MP or journalist (where, for public interest disclosures, **at least 90 days** must first have passed since your previous disclosure before this notice may be given).

It is important you understand strict criteria apply and you should obtain independent legal advice before making a disclosure to an MP or journalist.

For more information about the Australian whistleblowing laws (including how to make a disclosure directly to ASIC or the ATO), see the information available on the [ASIC](#) website (including [Information Sheet 239 How ASIC handles whistleblowing reports](#)) and the [ATO](#) website.

Whistleblowing laws outside Australia

You may make a disclosure regardless of where you are or where the conduct is occurring.

If your disclosure concerns the conduct of DCA, DCA people, or DCA operations based outside Australia, you may also have protections and obligations under the whistleblowing laws in the country in which you are based.

In respect of disclosures made in the UK, there are some circumstances in which you may make a disclosure to someone other than DCA, but only as provided for under the Whistleblowing laws of the UK. You should take independent legal advice before taking any steps to make a disclosure in the UK to anyone other than DCA.

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11 INVESTIGATION OF DISCLOSURES

Investigation process

When you make a disclosure under this policy, your disclosure will typically be investigated as follows. This process may vary depending on the nature of your disclosure.

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| STEP 1 | Safecall who receives your disclosure will provide the information to a Whistleblowing Manager, as soon as practicable, ensuring your identity is protected, unless you have consented otherwise. |
| STEP 2 | <p>The Whistleblowing Manager will receive notification in the first instance from noreply@safecall.co.uk informing them to log in to the platform as a new case has been logged. They can then log in and acknowledge / download the report document.</p> <p>The Whistleblowing Manager will determine whether your disclosure is covered by this policy and if a formal, in-depth investigation is required.</p> <p>If an investigation is required, the Whistleblowing Manager/s will determine whether the investigation of your disclosure should be conducted internally or externally and appoint an investigator with no personal interest in the matter. The Whistleblowing Manager/s may consider an external investigation is appropriate to ensure fairness and independence or because specialist skills or expertise are required.</p> |
| STEP 3 | The Whistleblowing Manager/s will receive notification 48 hours after the initial notification should the report remain un-acknowledged. Should the Whistleblowing Manager/s log in to the platform they will continue to see all cases. |
| STEP 4 | <p>The Whistleblowing Manager/s will ensure that the investigation is conducted in an objective and fair manner, ensuring that any employee mentioned in the disclosure has an opportunity to respond to the allegations prior to any adverse findings being made against them. Those employees are also entitled to access the EAP support service which is available to all employees.</p> <p>If you can be contacted (including through anonymous channels), we will give you regular updates on the status of the investigation as appropriate, with the frequency and timing of such updates depending on the nature of your disclosure.</p> |
| STEP 4 | The outcome of the investigation will be reported to the Board (protecting your identity, if applicable) and may, if the Whistleblowing Manager/s considers appropriate, be shared with you and any persons affected by the disclosure as considered appropriate by the Whistleblowing Manager/s. |

The Whistleblowing Manager/s will receive notification of a report which is not accessible to anyone else within the reporting structure.

Appropriate records and documentation for each step in the process will be maintained by the investigator.

Data Protection Laws and the General Data Protection Regulation (GDPR) may limit the amount of information that can be shared with you in relation to any investigation or outcome involving personal data of other individuals within Europe or the UK.

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Duration of investigation

DCA will aim to conclude the investigations within two months of receiving your disclosure. But that time may vary depending on the nature of your disclosure.

DCA may require further information to investigate disclosures

DCA may not be able to undertake an investigation if it is not able to contact you or receive additional information from you to fully investigate your disclosure. If you have made your disclosure anonymously, we suggest you maintain ongoing two-way communication with DCA, so DCA may ask follow-up questions or provide feedback. You may refuse to answer questions that you feel may reveal your identity at any time.

Investigation will be conducted in accordance with confidentiality protections

Subject to the exceptions allowed under section 0 of this policy or otherwise by law, the identity of a discloser (or information that is likely to lead to their identity becoming known) must be kept confidential at all times during and after the investigation (including in any reporting to the Board or to any persons affected).

12 SUPPORT AND PRACTICAL PROTECTIONS

DCA has in place processes for protecting, supporting, and monitoring the welfare of anyone who makes a disclosure. This includes risk assessment of any potential detriment, work adjustment considerations and support services as required. All employees have access to the Employee Assistance Programme (EAP).

13 BOARD REPORTING

The Whistleblowing Manager/s will, where appropriate (whilst maintaining confidentiality provide the Board or its delegated committee at least quarterly reports on all active whistleblowing matters, which may include information on:

- the number and nature of disclosures made in the last quarter (for example, by who, who to and matter type).
- how disclosures were made.
- the status of any investigations underway.
- any actions taken in relation to a disclosure.
- the frequency of communications with disclosers.
- the outcomes of completed investigations; and
- the timeframes for responding to and investigating disclosures.

The Board or its delegated committee will also be informed of any material incidents reported under this policy, including any information that may be materially price sensitive in accordance with DCA's Disclosure Policy.

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14 TRAINING

Our Whistleblowing Managers will receive training provided by the external service Safecall as well as ensuring all mandatory e-learning is complete, particularly training pertaining to maintaining confidentiality.

DCA will inform its external eligible recipients (for example, its auditor and tax agent) about their obligations under the Australian whistleblowing laws.

Our employees (including those in any overseas-based operations) will be informed on how to make a disclosure.

15 NON-COMPLIANCE WITH THIS POLICY

Any breach of this policy by a DCA officer, employee or contractor will be taken seriously by DCA and may be the subject of a separate investigation and/or disciplinary action.

A breach of this policy may also amount to a civil or criminal contravention under the applicable whistleblowing laws, giving rise to significant penalties.

We encourage you to raise any concerns about non-compliance with this policy with the Whistleblowing Managers in the first instance. You may also lodge any concerns with ASIC, APRA or the ATO for investigation.

16 MONITORING & POLICY REVIEW

This policy must be reviewed by the Board or its delegated committee with the assistance of the Whistleblowing Managers at least every three years to ensure it is operating effectively or more frequently if there are changes to regulations or legislation. Any recommended changes must be approved by the Board or its delegated committee.

DCA will ensure any updates to this policy, its processes and procedures following a review are widely disseminated to, and easily accessible by, individuals covered by this policy. Where necessary, additional training will be provided.

17 ASSOCIATED DOCUMENTATION AND REFERENCES

- DCA Disclosures Policy
- Australian Securities & Investments Commission (ASIC) Regulatory Guide 270 – Whistleblowing Policies
- Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019
- UK Employment Rights Act 1996
- UK (Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998

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18 DOCUMENT CONTROL

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| DOCUMENT REF / ID | GRC-P-005 |
| DOCUMENT VERSION | 1.1 |
| DOCUMENT COMPLIANCE | ISO 9001 (QMS), ISO 27001 (ISMS), UK Care Quality Commission (CQC) |
| POLICY TEMPLATE VERSION | 1.0 |
| DCA INFORMATION CLASSIFICATION | SHL_CONFIDENTIAL |
| THIRD PARTY CLASSIFICATION | N/A, DCA internal document |
| DMS DOCUMENTED INFORMATION | Yes, this policy is part of DCA Management System (DMS) documented information |
| AUDIENCE | Employees and contractors |
| DOCUMENT STORAGE LOCATION | DCA_Connect intranet |
| DOCUMENT FORMAT | Electronic (primary) Printed (optional, but require DCA information classification controls to be applied) |
| DOCUMENT RETENTION | Set according to the DCA information classification controls |
| PUBLISHED DATE | 01-JAN-2023 |
| NEXT REVIEW DATE | 01-JAN-2025 |
| DOCUMENT AUTHOR(S) | Martina Usher Wright & Jamie Aspinall |
| DOCUMENT OWNER | Martina Usher Wright & Jamie Aspinall |
| APPROVER | DCA Board |

18.2 Revision history (recent changes)

| VERSION | DATE | REVISION AUTHOR | SUMMARY OF CHANGES |
|---------|------------|---|---|
| 1.1 | 29/11/2022 | Martina Usher Wright Jamie Aspinall ARC | Change of policy template Inclusion of Whistleblowing Managers and removal of Whistleblowing Officers Addition of external service provider to manage confidential concerns raised by individuals |
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