REDEEMERS HEALTH VILLAGE

Human Resources Department

EXTERNAL COMMUNICATIONS & ESCALATION POLICY

Policy Code: HR-POL-015

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Date Approved:	—		

Relevant Standards

- Labour Act of Nigeria (Cap L1 LFN 2004)
- Nigeria Data Protection Act (NDPA) 2023
- RHV Code of Professional Conduct (HR-POL-023)
- RHV Whistleblowing & Protected Disclosure Policy (HR-POL-021)
- RHV Disciplinary Action Policy (HR-POL-003)

Amendment History

Issue	Status	Date	Reason for Change	Authorised
1	Draft	May 27, 2024	New Policy Implementation	
2	Final	June 2025	Policy Review & Update	CHRO
3	Final	April 28, 2026	Board Submission Revision	CHRO/CEO

1. Purpose

This policy establishes clear, enforceable guidelines for how all RHV personnel communicate with external parties and escalate unresolved internal concerns through the correct institutional channels. It aims to protect RHV's reputation, maintain the confidentiality of patient and operational information, and ensure that staff have a clear, structured, and protected pathway for raising legitimate concerns without bypassing internal governance or exposing RHV to avoidable legal and reputational risk.

2. Scope

This policy applies to all employees, contractors, volunteers, students, locum staff, and third-party partners engaged with RHV, in all forms of communication, written, verbal, digital, or published.

3. Definitions

- External Body: Any individual or organisation outside RHV including visionaries, RCCG body, government agencies, regulatory bodies, media organisations, professional associations, social media platforms, or members of the public.
- Line Manager / HOD: The employee's immediate reporting supervisor or Head of Department.
- Executive Management: The CEO, COO, CHRO, and other C-suite officers of RHV.
- Board: The RHV Board of Directors.

4. Internal Escalation Structure

All concerns, complaints, and grievances must be addressed internally first, through the following graduated escalation pathway:

Stage 1 — Line Manager or HR Department

All work-related queries, complaints, or concerns are directed in the first instance to the employee's line manager or Head of Department. Matters relating specifically to HR including harassment, discrimination, pay, or benefits are directed directly to the HR Department. If the concern involves the line manager personally, the employee proceeds directly to HR.

Stage 2 — Executive Management

Where Stage 1 has failed to resolve the matter within a reasonable timeframe (ordinarily ten working days), or where the matter involves patient safety risk, clinical quality, significant financial irregularity, or regulatory compliance the employee may escalate in writing to Executive Management, clearly stating the prior steps taken.

Stage 3 — Board of Directors

Where Executive Management has failed to adequately address a grave matter of governance, ethics, patient safety, or significant legal risk, the employee may escalate to the Board Chairman or the Chair of the relevant Board Committee through the officially designated contact channel, held by the Company Secretary and available to all employees on request.

Nothing in this escalation structure restricts any employee from reporting a genuine concern in good faith to an appropriate statutory authority (e.g., NCDC, MDCN, EFCC, ICPC) under the protections of the RHV Whistleblowing & Protected Disclosure Policy (HR-POL-021).

5. Prohibited External Disclosures

No employee may share any of the following with any external party without prior written authorisation from Executive Management or the Board:

- Internal communications, memos, board papers, or management correspondence of any kind

- Patient information, clinical case details, or any data that identifies a patient directly or indirectly
- Financial data, payroll information, budget documents, or management accounts
- Details of ongoing investigations, disciplinary matters, or legal proceedings
- Strategic plans, new service development proposals, or commercially sensitive operational information
- Any content shared with media organisations, journalists, bloggers, influencers, or social media platforms in RHV's name

6. Authorised External Communication

- All formal communications with regulatory authorities, government agencies, professional bodies, or legal representatives on RHV's behalf must be approved in writing by Executive Management before transmission.
- RHV's designated external spokespersons are specified in writing by the CEO. No other employee may speak to, correspond with, or grant interviews to media organisations on behalf of RHV without the CEO's express written authorisation.
- All media enquiries however informal must be referred immediately to the CEO or their designated communications lead. No employee should respond substantively to a media enquiry, even with 'no comment,' without management guidance.

7. Procedure for Internal Communication

1. Draft all internal communications or complaints clearly, stating the relevant facts, dates, supporting evidence, and the outcome you are seeking.
2. Send via official RHV channels (institutional email) to the appropriate person at the correct escalation stage.
3. If no acknowledgement is received within three (3) working days, send a polite follow-up reminder.
4. If the matter remains unresolved after five (5) additional working days, escalate to the next stage per Section 4 of this policy.

8. Sanctions for Non-Compliance

Minor Breach

Skipping the line manager or HOD without justification, or submitting an internal communication through an unofficial channel. Consequence: verbal warning and mandatory policy refresher training.

Major Breach

Communicating with an external regulatory body, professional association, or external stakeholder without authorisation. Consequence: formal written warning, suspension of external communication privileges, and mandatory policy refresher training.

Severe Breach

Leaking confidential patient data, financial information, or sensitive internal information to media or external parties; impersonating RHV in external communications; making false or damaging statements about RHV publicly. Consequence: disciplinary action up to and including summary dismissal; potential referral to law enforcement and relevant professional regulatory bodies.

9. Roles and Responsibilities

Employees

Follow the internal escalation pathway; seek written authorisation before any external communication; never engage media without CEO approval.

Line Managers / HODs

Acknowledge and respond to staff communications promptly and within the stated timeframes; escalate matters beyond their authority without delay.

HR Department

Receive and manage HR-related complaints; maintain records of all formal communications and escalations; advise staff on this policy.

Executive Management

Review escalated matters promptly and appropriately; authorise all external disclosures in writing; enforce this policy consistently.

Board of Directors

Receive Stage 3 escalations through the designated channel; ensure governance arrangements support this policy's operation.

10. Monitoring and Review

This policy is reviewed annually by the CHRO and the CEO. Any significant external communication incident triggers an unscheduled review. The CHRO reports on escalation patterns to the Board annually as part of the HR governance report.