REDEEMERS HEALTH VILLAGE

Human Resources Department

WHISTLEBLOWING & PROTECTED DISCLOSURE POLICY

Policy Code: HR-POL-026

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Date Approved:	—		

Relevant Standards

- Labour Act of Nigeria (Cap L1 LFN 2004)
- Nigeria Data Protection Act (NDPA) 2023
- RHV Conflict of Interest Policy (HR-POL-00)
- RHV Disciplinary Action Policy (HR-POL-005)
- RHV Grievance Policy (HR-POL-0)
- ILO Convention No. 190 — Violence and Harassment
- WHO Patient Safety and Healthcare Quality Standards

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

Redeemers Health Village (RHV) is committed to operating with complete integrity, transparency, and accountability — values that are inseparable from our faith-based identity and our duty to our patients. This policy exists to ensure that any employee, volunteer, contractor, or other stakeholder who has a genuine, good-faith concern about wrongdoing at RHV whether involving patient safety, financial misconduct, ethical breaches, legal violations, or any other serious irregularity has a safe, clear, and fully protected channel through which to raise it.

RHV recognises that speaking up takes courage, and that the culture of the institution must make it easier, not harder, to do the right thing. This policy guarantees that anyone who raises a concern in good faith will be protected from any form of retaliation, reprisal, or disadvantage regardless of the outcome of any subsequent investigation.

2. Scope

This policy applies to all current and former employees (full-time, part-time, temporary, and contract), volunteers, student placements, interns, agency staff, consultants, contractors, and third-party service providers engaged with RHV. It also extends to patients and family members who wish to raise a concern of public interest about RHV's operations or practices.

3. What is Whistleblowing?

Whistleblowing is the act of raising a concern about wrongdoing, malpractice, or a risk that affects others including patients, staff, or the wider public rather than merely one's own personal employment situation. It is distinct from a personal employment grievance, which is addressed through the RHV Grievance Policy.

A concern qualifies as a protected disclosure under this policy where the person raising it has a genuine, good-faith belief that one or more of the following is occurring, has occurred, or is likely to occur:

- A risk to patient safety, clinical quality, or the welfare of a vulnerable person
- Financial fraud, theft, misappropriation, or deliberate misuse of RHV's assets or funds
- Corruption, bribery, or improper financial relationships involving any RHV employee, contractor, or third party
- A criminal offence — whether committed, being committed, or likely to be committed
- A breach of RHV's legal, regulatory, or licensing obligations
- An undisclosed or mismanaged conflict of interest
- Falsification of medical, financial, HR, or operational records
- Bullying, harassment, or discrimination of a systemic or severe nature
- Any deliberate attempt to conceal any of the above

4. Reporting Channels

Concerns may be raised through any of the following channels:

- Email (Confidential Whistleblowing Channel): whistleblow@redeemershealthvillage.org
- Direct contact with the Head of HR, CHRO, COO, or CEO — by appointment or in writing
- Direct contact with the Board Chairman or Chair of the Audit & Governance Committee — for concerns involving Executive Management or the CEO (contact details available from the Company Secretary on request by any employee)
- Physical Whistleblower Drop Box — located in discreet, accessible areas throughout the RHV facility (QR codes are posted at drop box locations for digital access)

Anonymous reports are accepted through all channels. RHV will investigate all anonymous concerns that are sufficiently specific and credible to enable investigation. However, employees are encouraged to identify themselves where possible, as this assists the investigation process and enables RHV to provide feedback and

protection. The identity of a named reporter will be protected to the fullest extent possible consistent with conducting a thorough and fair investigation.

If you are unsure whether a concern rises to the level of a protected disclosure, you are encouraged to speak confidentially with HR — there is no penalty for seeking guidance, and you will not be treated as having made a formal report simply by asking.

5. Investigation Process

1. Acknowledgement: Where the reporter is identifiable, HR acknowledges receipt of the concern in writing within three (3) working days.
2. Initial Assessment: The CHRO or, where the CHRO is implicated, the CEO or Board Chair assesses the concern and determines the appropriate investigation pathway: internal HR investigation, independent panel investigation, or referral to an external regulatory or law enforcement authority.
3. Formal Investigation: Where a formal investigation is required, a designated Investigation Officer is appointed who has had no prior involvement in the matter. The investigation is conducted impartially, with full documentary evidence, witness interviews, and a right of response for the person under investigation. The identity of the reporter is protected throughout.
4. Outcome and Feedback: Where the reporter is identifiable, they are informed of the outcome of the investigation to the extent that confidentiality and legal obligations allow. RHV acts on all substantiated findings.
5. Timelines: RHV provides a status update to the reporter (where identifiable) within thirty (30) working days of acknowledgement.

6. Protection from Retaliation

RHV provides an absolute guarantee of protection from retaliation for any person who raises a concern in good faith under this policy. This protection applies whether or not the concern is ultimately substantiated.

Prohibited retaliatory conduct includes, without limitation:

- Dismissal, threatened dismissal, or any adverse change to employment terms
- Demotion, denial of promotion, or unfair performance assessment
- Harassment, bullying, intimidation, isolation, or deliberate exclusion
- Denial of training, development, or career opportunities
- Any other detriment connected to, or arising from, the protected disclosure

Any manager, colleague, or other person who retaliates against a whistle-blower or who encourages or facilitates retaliation will face immediate formal disciplinary action. Retaliation is itself treated as gross misconduct at RHV, and may result in summary dismissal.

7. False and Malicious Reports

The protections of this policy extend to concerns raised honestly and in good faith including concerns that are not, upon investigation, substantiated. A concern that turns out to be unfounded is not evidence that it was raised in bad faith. However, employees who knowingly make false, fabricated, or malicious reports with the deliberate intent to harm a colleague or to achieve a personal advantage will not be protected by this policy and will be subject to formal disciplinary action, up to and including dismissal. Such matters may also be referred to law enforcement.

8. Support for Reporters

- Employees who raise concerns may access confidential pastoral support, counselling, or HR guidance throughout and after the process.
- Where the concern involves potential legal complexity or a regulatory referral, RHV may advise the reporter to seek independent legal guidance.

- HR provides ongoing updates to the reporter (where identifiable) on the progress of the investigation, without breaching the confidentiality of the person under investigation.

9. Roles and Responsibilities

All Employees and Stakeholders

Report genuine concerns responsibly, promptly, and in good faith; maintain confidentiality about information received in connection with a disclosure; never retaliate or encourage retaliation against a reporter.

Line Managers and Heads of Department

Create a team environment where concerns can be raised openly and without fear; receive and act on concerns raised with them promptly; never discourage, dismiss, or retaliate against a person who raises a concern; escalate all significant concerns to HR or the CHRO without delay.

HR Department (CHRO)

Administer this policy; receive, triage, and coordinate all investigations; maintain a confidential Whistleblowing Register; provide guidance to reporters; protect the identity of reporters; report annually to the Board.

CEO

Ensures RHV's culture and governance structures make speaking up safe and normal; receives reports involving senior management; ensures appropriate organisational response including regulatory referral where warranted.

Board of Directors

Provides ultimate oversight of RHV's integrity framework; receives an anonymised annual Whistleblowing Report from the CHRO; holds management accountable for the effective operation of this policy.

10. Training and Communication

This policy is communicated to all employees during induction and is included in RHV's Policy Repository. Annual awareness refreshers including how to report, what protections apply, and how investigations work are mandatory for all staff. Managers receive specific training on managing disclosures and creating a safe reporting environment.

11. Monitoring and Review

The CHRO maintains a confidential Whistleblowing Register recording all disclosures, investigation outcomes, and any retaliation complaints. An anonymised summary is presented to the Board's Audit & Governance Committee annually. This policy is reviewed annually by the CHRO, with significant changes approved by the Board.