

Policy Reference: 174

# FREEDOM TO SPEAK UP: RAISING CONCERNS AT WORK

(POLICY & PROCEDURE FOR EMPLOYEES RAISING CONCERNS)

**Version: 05**

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<b>Ratified By (Committee / Group)</b>	Workforce & Communication Group
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<b>Target Audience</b>	All Staff and Contractors of WUTH
<b>Other Associated Strategies, Policies, Procedures, etc</b>	Trust Policy 135 - Disciplinary Policy Trust Policy 153 - Grievance Procedure Trust Policy 120 - Bullying & Harassment Policy Trust Policy 101 - Standards of Business Conduct Trust Policy 075 - Internet and Email Usage Policy Trust Policy 041a - Incident Reporting & Management Policy & Procedure Trust Policy 115 - Fraud & Corruption Policy and Response Plant Trust Policy 023 - Concerns and Complaints Handling National Freedom to Speak Up: Raising Concerns (Whistleblowing) Policy for the NHS, April 2016

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## 1 Introduction

### Speak up – we will listen

Speaking up about any concern you have at work is really important. In fact, it's vital because it will help us to keep improving our services for all patients and the working environment for our staff.

You may feel worried about raising a concern, and we understand this. But please don't be put off. In accordance with our duty of candour, our senior leaders and entire board are committed to an open and honest culture. We will look into what you say and you will have access to the support you need.

This 'standard integrated policy' was one of a number of recommendations of the review by Sir Robert Francis into whistleblowing in the NHS, aimed at improving the experience of whistleblowing in the NHS. It is expected that this policy (produced by NHS Improvement and NHS England) will be adopted by all NHS organisations in England as a minimum standard to help to normalise the raising of concerns for the benefit of all patients.

Our local process has been integrated into the policy and provides more detail about how we will look into a concern and what support is available for you.

## 2 Purpose

To provide a mechanism that promotes an open and honest culture that enables staff to raise concerns and:

- know how and what to do in order to raise their concern;
- feel supported in doing so; and
- receive feedback on any progress or actions taken

## 3 Scope – Who can raise concerns

Anyone who works (or has worked) in the NHS, or for an independent organisation that provides NHS services can raise concerns. This includes bank and agency workers, temporary workers, students, volunteers and governors.

Should a patient or other member of the public wish to raise a concern, the Trust has in place a Concern and Complaints Handling Policy and Procedure (Trust Policy 023). This is overseen and administered by the Patient Relations Team and is accessible via the Trust intranet / internet site.

## 4 What concerns can I raise?

We would encourage you to raise anything that gives you cause for concern, with particular regards to possible danger, risk, malpractice or wrongdoing including issues affecting staff's physical and emotional well-being.

Remember that if you are a healthcare professional you may have a professional duty to report a concern. **If in doubt, please raise it.**

Don't wait for proof. We would like you to raise the matter while it is still a concern. It doesn't matter if you turn out to be mistaken as long as you are genuinely troubled.

This policy is not for people with concerns about their employment that affect only them – that type of concern is better suited to our grievance policy, accessible via the Trustwide Policies section of the staff intranet or via the Human Resources Department.

Please also see [the Health Education England](#) video, accessible via the raising concerns section of the website.

## 5 Feel safe to raise your concern

If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of reprisal as a result. We will not tolerate the harassment or victimisation of anyone raising a concern. Nor will we tolerate any attempt to bully you into not raising any such concern. Any such behaviour is a breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action.

Provided you are acting honestly, it does not matter if you are mistaken or if there is an innocent explanation for your concerns.

## 6 Confidentiality

We hope you will feel comfortable raising your concern openly, but we also appreciate that you may want to raise it confidentially. This means that while you are willing for your identity to be known to the person you report your concern to, you do not want anyone else to know your identity. Therefore, we will keep your identity confidential, if that is what you want, unless required to disclose it by law (for example, by the police).

You can choose to raise your concern anonymously, without giving anyone your name, but that may make it more difficult for us to investigate thoroughly and give you feedback on the outcome.

## 7 Procedures – Who should I raise my concern with?

### Tell Someone

If you have a concern or issue at work, we hope you will feel able to raise it firstly with:

- Your line manager, supervisor, lead clinician or tutor

In many circumstances this will be the easiest way to get your concern resolved.

However, where you do not think this is appropriate or feel unable to raise your concern with those listed above, for whatever reason, you can raise the matter by contacting / using any of the following:

- 1) Departmental and Divisional line management team
- 2) Divisional HR Managers and other members of the HR team
- 3) Freedom to Speak Up Staff Guardians (see also section 9.1)
- 4) Trade Union representatives or Professional Organisations. (Details of all recognised trade union representatives are available on the intranet);
- 5) Health & Safety Team
- 6) Occupational Health Team
- 7) Safeguarding Team
- 8) Chaplaincy and Spiritual Care Team
- 9) All allegations of fraud or bribery should be reported to, and investigated by, the Trust's Local Counter Fraud Specialist on 0151 651 3917 or 07887 987005 (24hr local fraud reporting hotline). NHS Protect can be contacted on 0800 0284060 or use the online reporting facility at [www.reportnhsfraud.nhs.uk](http://www.reportnhsfraud.nhs.uk). Reference should also be made to the Trusts Fraud and Bribery Policy in such cases

Contact details of all those listed, can be found via the staff directory on the Trust intranet or via the switchboard operator.

Whichever route you choose, the most important thing to remember is to speak up and raise your concern.

to the medical literature, VI How to use an overview. JAMA 1994; 272: 1367-71

## **8 Procedures – What if my concern remains unresolved?**

### **8.1 Escalation**

If you have raised your concern as detailed in section 7, and despite investigation and / or feedback, you still remain concerned; concerns should then be escalated to a senior manager. If for whatever reason you feel unable to do so or need further guidance and support, please again refer to those listed in section 7.

### **8.2 Contact a Director**

If the above channels (in section 7 and 8.1) have been followed and concerns still remain, or you feel that the matter is so serious that you cannot discuss it with any of the above please contact, either;

- i. Mr James Mawrey, Director of Workforce
- ii. Medical Director
- iii. Gaynor Westray, Director of Nursing & Midwifery
- iv. Non-Executive Director and Trust Freedom to Speak Up Guardian, Cathy Maddaford.

Contact details can be found on the internet/intranet or via the Trust's switchboard.

### **8.3 External Contacts**

You may also wish to refer concerns to an external source, therefore in these instances, please refer to sections 16 to 18.

### **8.4 Grievance Procedure**

Unresolved concerns may also be raised to the Trust's Grievance Procedure (Policy 153).

## **9 Advice and support**

Those listed in section 7 have been trained in receiving concerns and will give you information about where you can go for more advice and support.

### **9.1 Freedom to Speak up Guardians**

The Trust has appointed Freedom to Speak Up Guardians to work alongside its leadership teams to encourage staff to speak up and support those who have concerns. This can be at any point, whether staff have yet to raise the concern and may be unsure as to what to do, or whether concerns raised remain unresolved and further guidance and support is required.

Freedom to Speak Up Guardians are a point of contact for all staff to raise concerns and act on them by:

- a. Escalation to the appropriate level (line manager, divisional manager, Director of Workforce or Executive Team including direct access to the Chief Executive if necessary)
- b. Signposting to the appropriate person or service for further advice and support e.g. Occupational Health or where issues raised as part of this process clearly relate to employee relations, that they are signposted to Human Resources and Staff Side (Trade Union) representatives.
- c. Recording and monitoring of concerns raised, providing timely feedback where possible.
- d. Monitoring any trends and themes arising, providing reports as detailed in section 10.

Full details of the Freedom to Speak Up Guardians are available on the Raising Concerns section of the Trust's intranet/internet (accessible via the home page). See also section 19 for further duties and responsibilities.

### **9.2 Freedom to Speak up Advocates**

In order to promote the importance of speaking up and encouragement of staff to raise their concerns, Advocates will also be operating within the Trust and can also be approached for advice and support if necessary.

Key responsibilities of advocates include:

- Escalate all concerns raised to the FTSU Guardian for appropriate management
- Deal with identified cases as agreed with the FTSU Guardian
- Signposting staff to appropriate sources of support eg, line managers, divisional managers, Occupational Health, Policies or where issues raised as part of this process clearly relate to employee relations, that they are signposted to Human Resources and Staff Side (Trade Union) representatives.
- Promotion of FTSU Guardian Service at all available opportunities on a planned and ad hoc basis
- Compliance with the Data Protection Act and Information Governance requirements

## 10 How should I raise my concern?

You can raise your concerns in confidence with any of the people listed above in person, by phone or in writing (including email).

Staff can visit, phone or write in confidence to one of the Staff Guardians at Staff Engagement Team, Education Centre, Arrowe Park Hospital or by using the confidential email address: [wih-tr.RaisingConcerns@nhs.net](mailto:wih-tr.RaisingConcerns@nhs.net). A Raising Concerns at Work Form is also attached at appendix 2 along with an online reporting option via the Raising Concerns section of the Trust intranet / internet pages (accessible via the home page). These will all be received and reviewed by the Freedom to Speak Up Guardians.

Freedom to Speak Up Guardians have bleep access where urgent cases may exist or can contact the FTSU Guardian dedicated mobile phone.

Whichever route you choose, please be ready to explain as fully as you can the information and circumstances that gave rise to your concern.

## 11 What will we do?

We are committed to the principles of the Freedom to Speak Up review and its vision for raising concerns, and will respond in line with them (see Annex B).

We are committed to listening to our staff, learning lessons and improving patient care. On receipt, the concern will be recorded and you will receive an acknowledgement within three working days. The central record will record the date the concern was received, whether you have requested confidentiality, a summary of the concerns and dates when we have given you updates or feedback.

### 11.1 Investigation

Where you have been unable to resolve the matter quickly (usually within a few days) with your line manager, we will carry out a proportionate investigation – using someone suitably independent (usually from a different part of the organisation) and properly trained – and we will reach a conclusion within a reasonable timescale (which we will notify you of). Wherever possible we will carry out a single investigation (so, for example, where a



concern is raised about a patient safety incident, we will usually undertake a single investigation that looks at your concern and the wider circumstances of the incident). The investigation will be objective and evidence-based, and will produce a response that focuses on identifying and rectifying any issues, and learning lessons to prevent problems recurring.

We may decide that your concern would be better looked at under another process; for example, our process for dealing with bullying and harassment. If so, we will discuss that with you.

## **11.2 Communicating with you**

We will treat you with respect at all times and will thank you for raising your concerns. We will discuss your concerns with you to ensure we understand exactly what you are worried about. We will tell you how long we expect any investigations to take and when to expect feedback. We will keep you up to date with any progress and wherever possible, we will share the full findings / investigation report with you (while respecting the confidentiality of others).

Any employment issues (that affect only you and not others) identified during the investigation will be considered separately.

## **11.3 How will we learn from your concern?**

The focus of any discussion/investigation will be on improvement. Where it identifies improvements that can be made, we will track them to ensure necessary changes are made, and are working effectively. Lessons will be shared with teams across the organisation, or more widely, as appropriate.

Concerns raised will be monitored on a regular basis with the Director of Workforce, HR and Freedom to Speak Up Guardians, whereby any trends or themes will be monitored and appropriate actions taken as necessary. Update reports will be provided to the Trust Board and appropriate committees (see also sections 12 and 13) on a regular and ongoing basis.

Anonymity will be maintained throughout this process.

## **12 Board oversight**

The board will be given high level information about all concerns raised by our staff through this policy and what we are doing to address any problems. We will include similar high level information in our annual report. The board supports staff raising concerns and wants you to feel free to speak up.

## 13 Review

We will review the effectiveness of this policy and local process at least annually, with the outcome published and changes made as appropriate.

Concerns raised will be reviewed (as detailed in section 11), with any themes or trends identified and actions taken to address.

## 14 Malicious Allegations

Whilst the Trust is committed to this policy and positively encourages staff to raise their concerns, the Trust will not tolerate concerns with malicious intention (for instance, in order to cause disruption within the Trust) or for personal gains (to get someone else you dislike into trouble). Staff raising concerns that are investigated and found to be of a malicious nature will be treated in accordance with the Trust's Disciplinary Policy (Policy no. 135).

## 15 Settlements Agreements

All employees may raise concerns about patient care and safety, or anything that could be in the wider public interest. Any confidentiality clauses, whether within the Contract of Employment or any other legal document with the Trust, will not prevent the person from speaking out about concerns of patient safety or anything that could be in the wider public interest.

## 16 Raising your concern with an outside body

If for any reason you do not feel comfortable raising your concern internally, you can raise concerns outside of the organisation with:

- [NHS Improvement](#) for concerns about:
  - how NHS trusts and foundation trusts are being run
  - other providers with an NHS provider licence
  - NHS procurement, choice and competition
  - the national tariff
- [Care Quality Commission](#) for quality and safety concerns
- [NHS England](#) for concerns about:
  - primary medical services (general practice)
  - primary dental services
  - primary ophthalmic services
  - local pharmaceutical services
- [Health Education England](#) for education and training in the NHS
- [NHS Protect](#) for concerns about fraud and corruption.

## **17 Making a “Protected Disclosure”**

There are very specific criteria that need to be met for an individual to be covered by whistleblowing law when they raise a concern (to be able to claim the protection that accompanies it).

Protected disclosures can be raised in the same way as all other concerns (as per section 7), along with a defined list of ‘prescribed persons’ external to the Trust (similar to those listed in section 16). For further guidance and support (and to help you consider whether you might meet these criteria), please contact those listed in section 7 or seek independent advice from the Whistleblowing Helpline for the NHS and social care (08000 724 725), Public Concern at Work or a legal representative.

## **18 National Guardian Freedom to Speak Up**

The new National Guardian can independently review how staff have been treated having raised concerns where NHS trusts and foundation trusts may have failed to follow good practice, working with some of the bodies listed above to take action where needed.

## **19 Duties / Responsibilities**

### **19.1 Chief Executive**

The Chief Executive is ultimately accountable to the Board for the Trust’s compliance with Statute and Regulation.

### **19.2 Director of Workforce**

The Director of Workforce is responsible for monitoring this procedure and the concerns/issues that are raised as a result. If they result in an allegation of fraud the department of Finance should be informed.

### **19.3 Non Executive and Executive Directors**

In the event of a Non Executive Director receiving concerns, he/she are responsible for the concerns/issues that are raised as a result. They must notify the Director of Workforce as soon as possible.

### **19.4 Anyone to whom a concern has been reported**

#### **Are required to:**

- ensure a timely investigation takes place into the concern and issues raised;
- where appropriate, implement actions/recommendations identified;
- provide a response to the person who received the concern i.e. Freedom to Speak Up Guardian

- ensure that feedback on any progress or actions taken is fed back to the person raising the concern directly, or where they wish to remain anonymous; feedback should be highlighted through the standard Trust communication channels
- ensure that, where the person raising the concern is known (or suspected), there is no victimisation or less favourable treatment; and ensure any matter raised directly with them, which falls within the definition of a “protected disclosure” under the Public Interest Disclosure Act, is dealt with using this policy and that Trust Freedom to Speak Up Guardians are notified to enable the case to be appropriately recorded and reported.
- Where a concern is raised from an external source, the Trust Freedom to Speak Up Guardians must be informed so as to aid further monitoring.

### **19.5 Staff/Contractors /Volunteers/Students and Honorary Appointments**

Any individual who falls into one of the above categories has a responsibility to report any legitimate concerns. Professional staff have a duty under their registration requirements to report any suspected malpractice to their employer and governing bodies. Failure to report such matters will be treated as a serious disciplinary offence and referred to the relevant professional organisations.

### **19.6 Staff Side Representatives**

The role of the Staff Side is to advise their members of the options open to them and the relevant Trust Policy to follow and to support any employee who wishes to bring a concern to the attention of the Trust and act as an advocate in the first instance.

### **19.7 Freedom to Speak Up Guardians**

**will:**

- treat your concern confidentially unless otherwise agreed
- ensure you receive timely support to progress your concern
- escalate concerns as necessary to the Director of Workforce and/or board, including any indications that you are being subjected to detriment for raising your concern
- remind the organisation of the need to give you timely feedback on how your concern is being dealt with
- ensure you have access to personal support since raising your concern may be stressful.
- offer advice regarding the policy, process and support available;
- keep records of the concern and any resulting actions for feedback to the person raising the concerns;
- use internal mechanisms to promote the policy within the Trust. This may include publicising examples of some of the more general concerns raised and resulting actions taken;
- meet regularly with the Director of Workforce to explore common themes identified’ and prepare quarterly reports to the Quality and Safety Committee, Workforce and Communications Group and both quarterly and annual reports to

the Trust Board

## **19.8 Committee Roles**

### **19.8.1 Trust Board**

Trust Board has overall responsibility for ensuring Raising Concerns at Work cases are dealt with appropriately within the Trust.

### **19.8.2 Workforce and Communication Group**

The Workforce & Communication Group is responsible for the approval and performance management of this Policy.

### **19.8.3 Quality & Safety Committee**

The Quality & Safety Committee will receive quarterly updates on data, trends and themes and any learning outcomes identified. They will also receive an annual report on the implementation of the Policy within the Trust.

## **20 References**

Francis Report, "Freedom to Speak Up Review", February 2015.

Public Interest Disclosure Act (1998) The British Standards Institution (BSI) Whistleblowing Arrangements Code of Practice. Information regarding the Act and Code of Practice is available on the internet.

Freedom to Speak Up: Raising Concerns (whistleblowing) Policy for the NHS, April 2016.

WUTH Grievance Procedure (Policy 153) December 15.

WUTH Disciplinary Policy (Policy 135) April 2016.

## Appendix 1 - Guide for Anyone to Whom a Concern has been Reported

### If someone wishes to report to you, a concern within the workplace:

In all situations you should:

- 1) Thank the person for telling you about the concern.
- 2) Take the person's concern seriously.
- 3) Recognise that raising a concern can be a difficult experience for certain people and offer them appropriate support. (For details refer to Section 7 of this policy).
- 4) Ensure that the concern is being reported under the correct procedure, the concern may need to be dealt with under the Grievance, Bullying & Harassment, Disciplinary / MHPS Policy, Health & Safety Policy.
- 5) Inform the person how you will progress their concern and discuss reasonable timeframes for feedback.
- 6) Respect the confidentiality of the individual if they have requested this.
- 7) Determine whether there are serious grounds for concern and investigate as soon as possible and within the given timeframe of one month wherever possible.
- 8) Are there any safeguarding issues? Inform the Safeguarding Team
- 9) If the concern is from an external source, Freedom to Speak Up Guardians must be notified.
- 10) Consider who should handle the investigation and appoint an Investigator; if the concern is very serious or wide reaching ensure an appropriate level of seniority for the investigating officer. Know when to ask for help or advice from your own management structure.
- 11) Take prompt action to resolve the concern or refer it on to the appropriate person for action.
- 12) Keep the person informed of the progress if there are delays in the investigative stage.
- 13) Monitor and review the situation.
- 14) Ensure appropriate feedback is given to the person raising the concern, with due care not to infringe the rights or duties owed to other parties.
- 15) Ensure person reporting genuine concerns are not penalised in any way.
- 16) Consider reporting to the Trust Board and/or an appropriate regulator the outcome of any genuine concern where malpractice or a serious safety risk was identified and addressed.
- 17) Provide a record of the concern raised and actions taken to address the concern to the Staff Engagement Team to be held on the central record of concerns raised under the Raising Concerns at Work Procedure. Appendix 2 can be used for this purpose.

## Appendix 2 - Raising Concerns at Work Form

What is your concern / issue? *Please feel free to attach additional sheets if necessary.*

Have you raised this matter before? (please tick)     Yes     No

If yes, with whom and when \_\_\_\_\_

Please note any possible solutions to your concern? *Add additional sheets if necessary*

Thank you for letting us know your concerns and any potential suggestions you have for overcoming them.

You can submit this form anonymously, however we would like the opportunity of being able to discuss this with you in more detail if necessary and to provide you with additional support if required, along with feedback on any progress or actions taken in response to the comments made. In order for us to do this, therefore if possible please therefore provide the following:

Name \_\_\_\_\_ Job Title \_\_\_\_\_

Department \_\_\_\_\_ Contact Number \_\_\_\_\_

Email address (if you have one) \_\_\_\_\_ Date \_\_\_\_\_

This form can now be submitted to:

- Your line manager; or
- Staff Guardian, c/o Staff Engagement Team, Education Centre, Arrowe Park Hospital

Once submitted, your comments will be recorded and the most appropriate course of action will be determined as soon as possible.

## Appendix 3 - Raising Concerns at Work Monitoring Form

This form is for completion by the person with whom the concern is raised\*:

Name of person in receipt \_\_\_\_\_ Job Title \_\_\_\_\_

Department: \_\_\_\_\_ Date received: \_\_\_\_\_

Contact made on \_\_\_\_\_ (with individual who raised concerns)

Any additional information:

Actions agreed:

Support required?      Yes       No

If yes, details of action taken:

Actions completed?      Yes       No       Date: \_\_\_\_\_

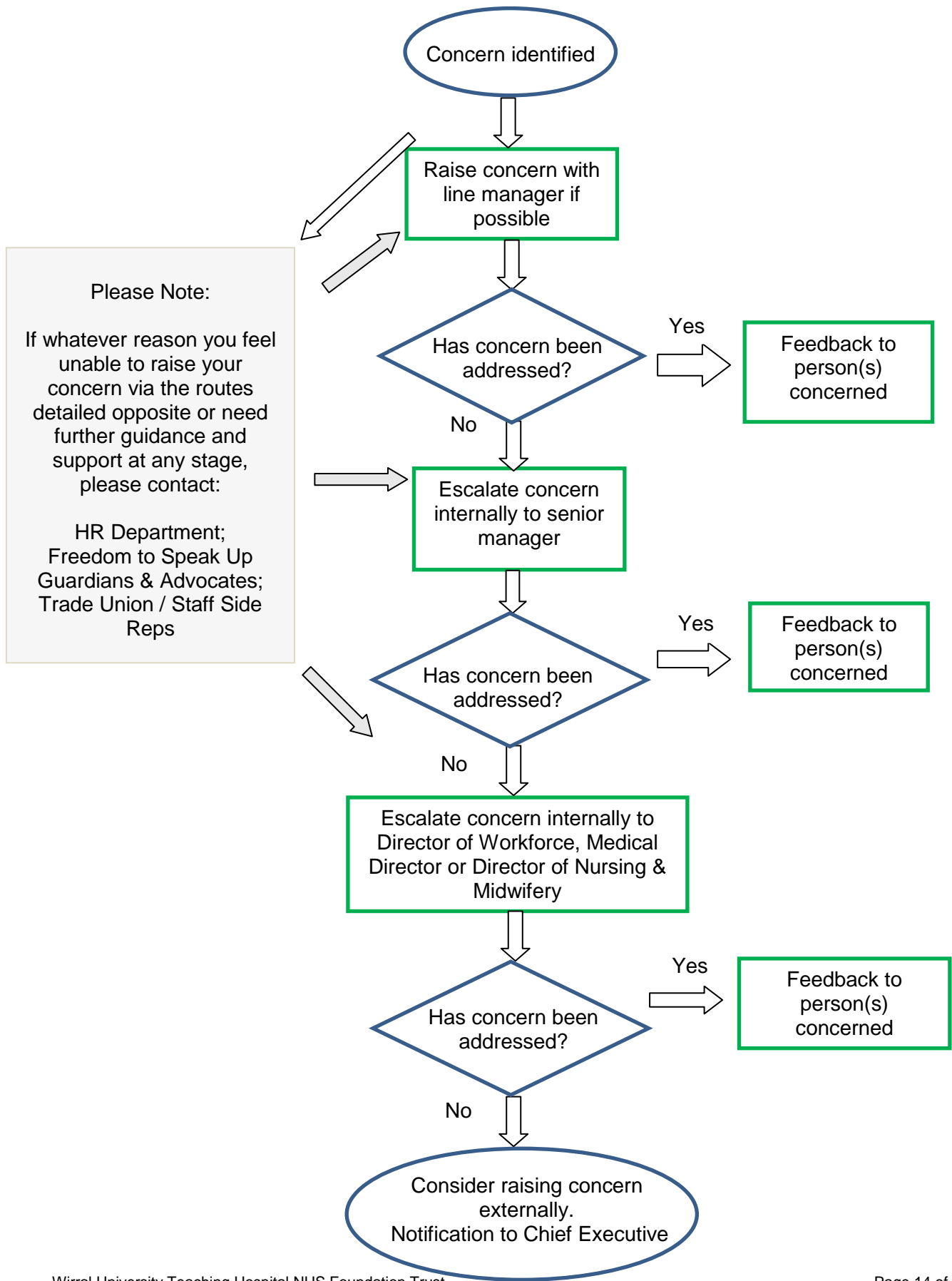
Date of feedback given: \_\_\_\_\_

Additional comments:

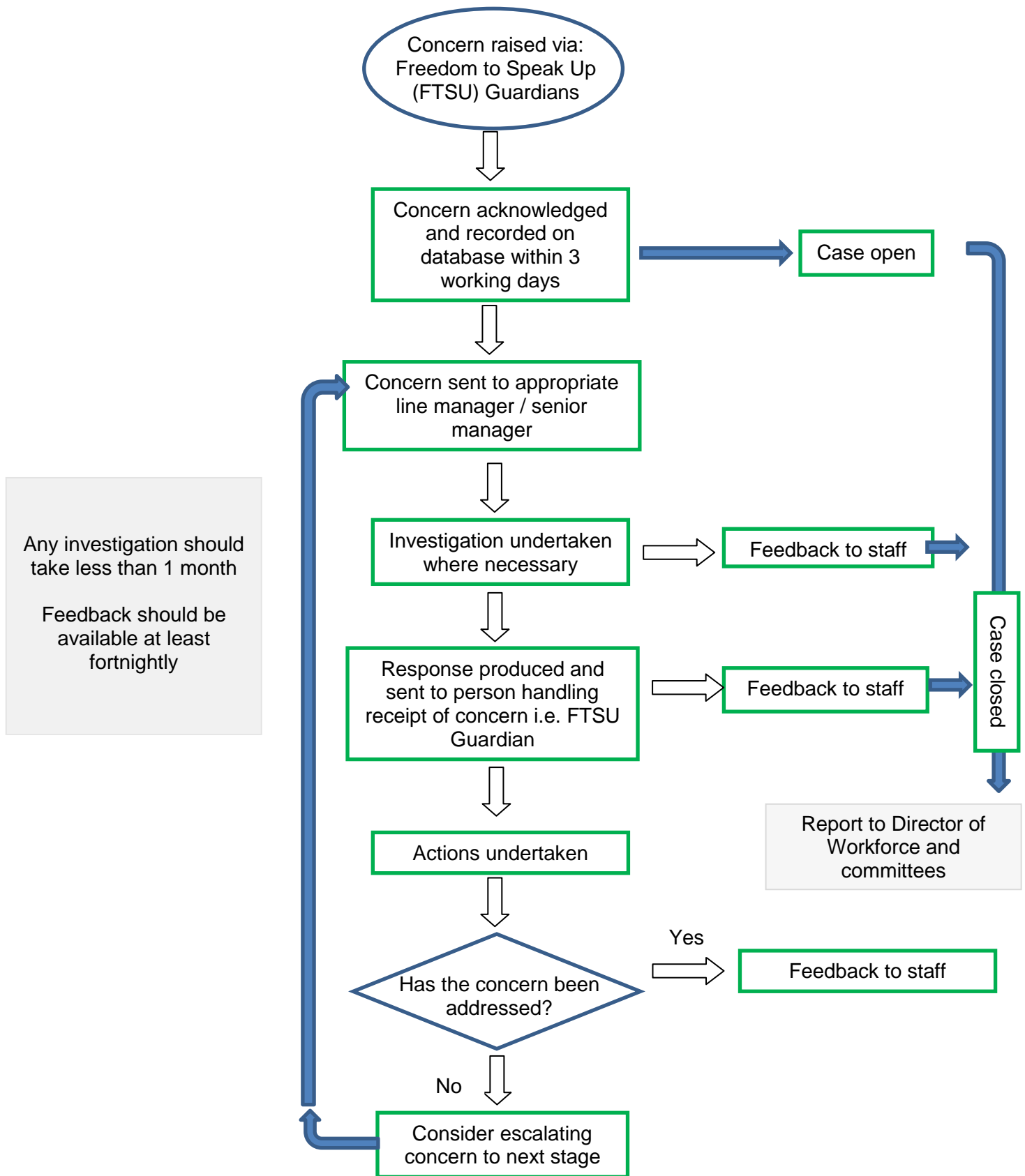
\*With the exception of Freedom to Speak Up Guardians who will record and monitor via confidential database.



## Appendix 4 - Stages of Raising Concerns at Work



## Appendix 5 - Raising Concerns at Work – Freedom To Speak Up (FTSU) Guardians



## Consultation, Communication and Implementation

Consultation Required	Authorised By	Date Authorised	Comments
Equality Analysis	Sharon Landrum	30 <sup>th</sup> November 2016	Initial Equality Analysis completed
Policy Author Checklist	Sharon Landrum	23 <sup>rd</sup> January 2017	Checked for workforce / development, medicines, finance or wider corporate implications.
Other Stakeholders / Groups Consulted as Part of Current Version Development	Policy Group 17 <sup>th</sup> January 2017 Partnership Steering Group 21 <sup>st</sup> February 2017		
Trust Staff Consultation via Intranet	Consulted through collective bargaining mechanism		

Date notice posted in the News Bulletin.	Date notice posted on the intranet
February 2017	February 2017

Describe the Implementation Plan for the Policy / Procedure (Considerations include; launch event, awareness sessions, communication / training via DMTs and other management structures, etc)	By Whom will this be Delivered?
HR Managers to present the procedure at Divisional and Corporate Services Management Teams (DMTs and CSMTs) and members of these are responsible for updating their staff in their Division/ Department. All new staff made aware of this policy and procedure at induction. Existing staff will be made aware of this policy through the Weekly News Bulletins. The policy will be made available on the intranet and internet.	HR Team/Line Managers

## Version History

Date	Ver	Author Name and Designation	Summary of Main Changes
25/09/09	1	Lawrence Osgood, Principal Organisational Development Manager	New Policy
January 2013	2	Jill O'Callaghan	Policy review
12 <sup>th</sup> August, 2013	3	James Mawrey, Associate Director of Human Resources	Major re-write of policy to give clarity over route for raising concerns and options available. Simplification of raising concerns including the addition of a dedicated email. In re-writing this policy the findings of the Francis report were taken into account.
9 March 2015	3.1	Finola O'Donnell, HR Manager	Include 5.4 on receiving and feeding back on anonymous concerns
June 2015	4	Sharon Landrum, OD Facilitator / Staff Guardian	Policy review following findings of the raising concerns LiA work stream and Francis Report 2015. Removal of "whistleblower" term, widening of access to policy with a reduction of references to PIDA and a general softening of language throughout. Update of new processes and support mechanisms due to introduction of Staff Guardians. Inclusion of safeguarding and greater emphasis on handling of concerns including feedback to the reporter.
Dec 2015	4.1	Sharon Landrum, OD Facilitator/Staff Guardian	Addition of line manager/senior manager responsibility to inform Staff Guardians when concerns are raised from external sources. Some additional minor changes i.e. removal of HR from flowchart in Appendix 4 and change from employee to person in appendix 1.
Feb 2016	4.2	Isla Kennedy, Assurance Support Officer	Ratified and review dates on version 4.1 not correct. Amended to follow dates on version 4

			(ratified July 2015, review date July 2018) Front cover dates and footer dates updated.
Nov 2016	5	Sharon Landrum, FTSU Guardian	<p>Full review of policy in line with launch of National Policy and processes revised following annual review.</p> <p>Language and sections simplified.</p> <p>Inclusion of FTSU section including new Advocate role</p> <p>KPI amended</p> <p>Inclusion of new quarterly data to Q&amp;S Committee</p> <p>Sources of support updated and external support updated.</p> <p>Raising Concerns Process itself updated from Step 1, 2 and 3 to Tell someone and then what to do if concerns remain unresolved</p>

### Monitoring Compliance with the Policy

Describe Key Performance Indicators (KPIs)	Target	How will the KPI be Monitored?	Which Committee will Monitor this KPI?	Frequency of Review	Lead
<del>Investigation completed within 4 weeks</del> Acknowledgement sent to reporter within 3 working days	100%	Annual Report	Workforce and Communication Group	Annually	Director of Workforce
Annual review of effectiveness of the policy and action plan to be drawn up where deficiencies are identified	100%	Annual Report	Workforce and Communication Group	Annually	Director of Workforce
Percentage of staff aware of Raising Concerns Policy	90%	Staff survey	Workforce and Communication Group	Annually	Director of Workforce

### Performance Management of the Policy

Who is Responsible for Producing Action Plans if KPIs are Not Met?	Which Committee Will Monitor These Action Plans?	Frequency of Review (To be agreed by Committee)
Director of Workforce	Workforce and Communication Group	Annually