



Freedom to Speak Up Policy 'Speak up to make a difference'

Please Note: This policy is currently under review and is still fit for purpose.

This procedural document supersedes:

Raising Concerns - We Care, We Listen, We Act – CORP/EMP 14 v.6

Whistleblowing Policy - Voicing your Concerns – CORP/EMP 14 v.5



Did you print this document yourself?

The Trust discourages the retention of hard copies of policies and can only guarantee that the policy on the Trust website is the most up-to-date version. **If, for exceptional reasons, you need to print a policy off, it is only valid for 24 hours.**

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Target audience:	Trust-wide

Amendment Form

Version	Date Issued	Brief Summary of Changes	Author
Version 7	30 January 2020	Overall policy review in line with the revised National guidance and the new 'Freedom to Speak Up' Strategy. Please read in full.	P Hill
Version 6	17 October 2016	Policy title renamed following the National Whistleblowing policy and reference to Freedom to Speak Up Guardian role.	L Robinson
Version 5	3 April 2014	Amended in line with Enterprise and Regulatory Reform Act 2013 that amended the Employment Rights Act 1996. This document has also been reviewed in line with Trust APD document and should be read in full.	Diane Culkin
Version 4	January 2011	<ul style="list-style-type: none"> • NHS constitution • Speak up for the NHS • Changes to organisation • Non executive Director identified 	H Selvidge
Version 3	Dec 08	<ul style="list-style-type: none"> • The policy has been re-drafted and will need to be re-read in full 	J Lang
Version 2	May 2005	<ul style="list-style-type: none"> • Addition of paragraph on "sexual behaviour" following the Ayling Inquiry 	H Selvidge

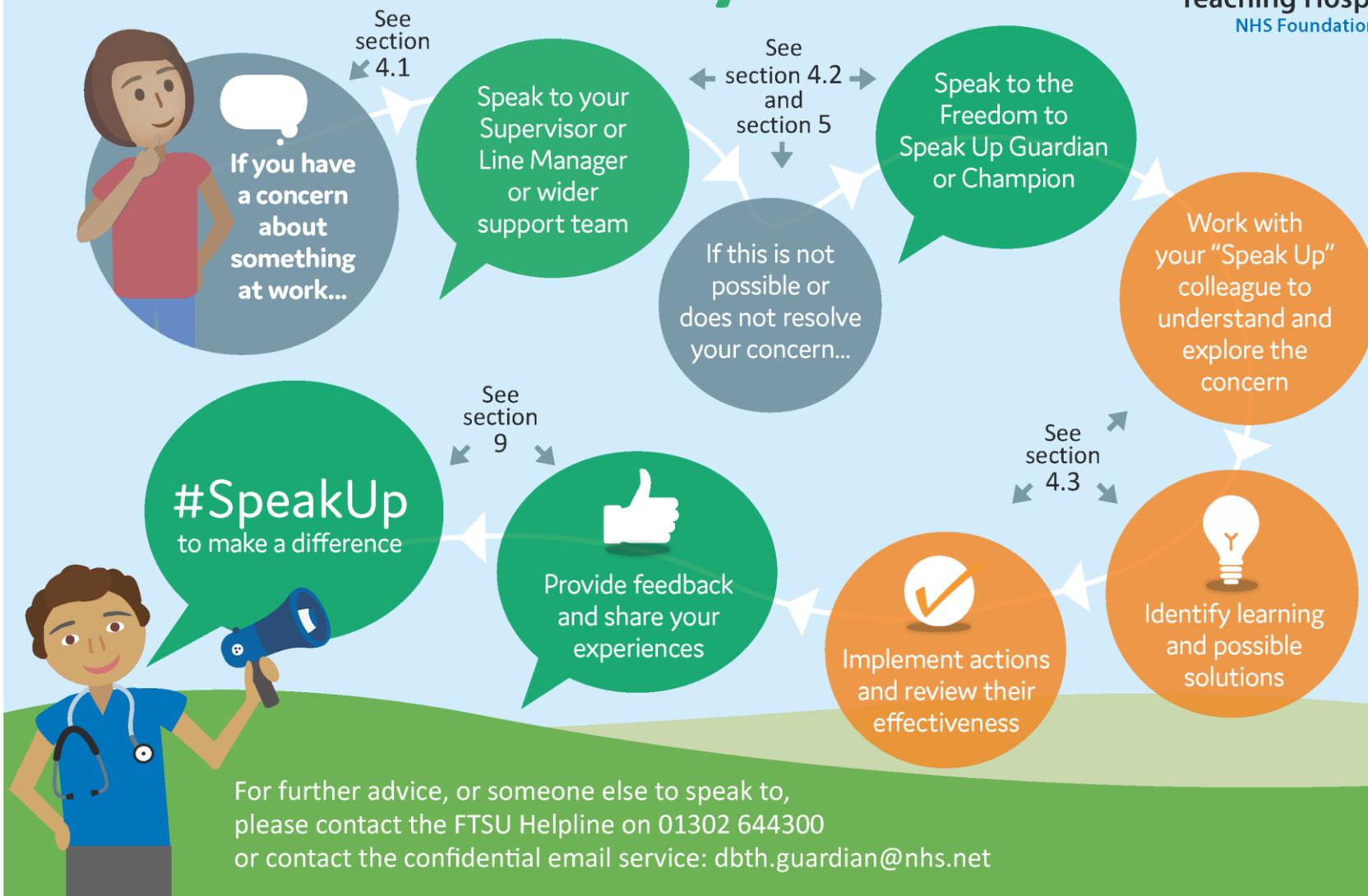
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Doncaster and Bassetlaw
Teaching Hospitals
NHS Foundation Trust

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For further advice, or someone else to speak to, please contact the FTSU Helpline on 01302 644300 or contact the confidential email service: dbth.guardian@nhs.net

1 INTRODUCTION

Doncaster and Bassetlaw Teaching Hospitals NHS Foundation Trust (DBTH) is committed to providing the highest standard of care and governance. For this standard to be maintained the Trust actively encourages an open and responsive 'Speak Up' Culture, where staff feel confident to raise concerns. This is one of the key elements of ensuring outstanding patient safety and a safe and effective workforce.

Doncaster and Bassetlaw Teaching Hospitals NHS Foundation Trust (DBTH) supports the implementation of Sir Robert Francis's recommendations following the Mid Staffordshire investigation and therefore this policy incorporates the key principles of the NHSE/NHSI integrated whistleblowing policy for the NHS (**Appendix 1**).

At one time or another we all may have concerns about things that are happening at work and usually these concerns can be easily resolved. However, when the concern feels serious because it is about a possible danger, professional misconduct or financial malpractice that might affect patients, colleagues, or the Trust itself, it can be difficult to know what to do.

Speaking up about a concern at work is really important, in fact it is vital because it enables us to keep improving our services for patients and the experience of our staff.

This policy has been developed to provide guidance on how to 'Speak Up' about concerns in a responsible and constructive manner, without fear of victimisation, ensuring that these issues are dealt with in a fair, timely and consistent manner across the Trust. It should be read in conjunction with any relevant professional code of conduct/guidelines which it is intended to complement.

This policy applies to all employees, and all areas of the Trust, including permanent, temporary and bank employees. The staff of our contractors (including agency workers) and volunteers may also raise concerns using this policy without fear of recrimination.

Under the 2016 terms and conditions for doctors and dentists in training the role of Guardian for Safe Working Hours has been established. This role will ensure that issues of compliance with safe working hours are addressed as they arise and will provide assurance to the Board of Directors that doctors' working hours are safe.

2 PURPOSE

The purpose of this policy is to encourage and enable staff to 'Speak Up' about clinical and other concerns within the Trust in a constructive and positive manner, rather than overlooking a problem or 'whistle blowing' elsewhere.

By its use, the Trust aims to encourage an open culture, and to reassure staff that concerns raised correctly under this policy will be listened to and acted on appropriately. It works to embed an active culture of working together to 'Make a difference' to patient safety and staff

experience and allows the Trust to listen to, respond to and learn from all concerns that raised in an appropriate and timely manner

It has been developed in response to the Public Interest Disclosure Act 1998, whereby employees who raise legitimate concerns that they reasonably believe are in the public interest are protected from adverse treatment by the Trust or from suffering a detriment, such as bullying and harassment from another worker. This policy sets out the responsibility of employees and other workers and enables managers to demonstrate accountability.

The policy is intended to address concerns promptly where the interests of others, or of the Trust itself are at risk. It does not address individual or collective issues, which are more properly dealt with under the Trust's other policies, such as the Grievance and Dispute Procedure or Fair Treatment for All Policy.

3 DUTIES AND RESPONSIBILITIES

3.1 The Trust

The Trust is ultimately responsible for ensuring that the organisation adopts an open and responsive 'Speak Up' Culture, where staff feel confident to raise concerns.

3.2 The Chief Executive

The Chief Executive is responsible for driving forward the above culture, ensuring that effective systems are in place to support this policy and the wider FTSU strategy.

3.3 Executive Directors and Senior Leaders

Executive Directors and Senior Leaders have a responsibility to ensure that this Policy is adhered to by all staff that they support and for the provision of advice and information relating to Speaking Up (Whistleblowing).

3.4 Freedom to Speak up Guardians

Freedom to Speak up Guardians have a responsibility to work alongside the Trust's leadership teams to support the organisation in becoming a more open and transparent place to work, where all staff are actively encouraged and enabled to speak up. They work together with key partners to ensure lessons are learnt and improvement made and are also responsible for providing confidential advice to staff who may not know who they should raise their concern with, and to ensure that anyone who does raise a concern is appropriately supported and not subject to any detrimental treatment.

3.5 Freedom to Speak up Champions

Freedom to Speak up Champions have a responsibility to advocate an open and responsive 'Speak Up' Culture, working as a 'Sign poster' to encourage the staff they work with or support to raise concerns proactively in order to make a difference.

3.6 Key Freedom to Speak up Partners

Key Freedom to Speak up Partners including Human Resources, Clinical Governance, Quality Improvement and Staff Side Representatives, have a responsibility to support the FTSU agenda by receiving, responding to and learning lessons from concerns raised in line with this policy and the FTSU Strategy.

3.7 All Trust Managers

All Trust managers have a duty to:

- Develop and create a culture where employees can Speak Up and discuss concerns.
- Take the employee's concerns seriously and understand the difficult position they may be in.
- Evaluate the basis of any concerns brought to their attention, taking prompt action to resolve the concern or to refer to an appropriate person.
- Seek appropriate advice
- Keep the employee informed of the process.
- Monitor and review the situation.
- Inform appropriate members of the Trust i.e. the Director of People and Organisational Development.

3.8 All employees

All employees are responsible for:

- Speaking Up as soon as possible in an objective and factual way, in line with this policy and the accompanying procedure.
- Keeping records, where possible, of any incidents and potential witnesses
- Co-operating with any investigation, if appropriate, including being available for interview, providing a statement and/or documentation.
- Maintaining the confidentiality of patients and staff.

4 PROCEDURE – DECIDING WHETHER TO SPEAK UP

4.1 When to Speak Up

This can be a hard decision. You might feel it's not your business, or someone else will do something, or you don't have any evidence, or you are being disloyal to your colleagues, or you will be victimised. Or you might have seen someone else raising a concern and experiencing some of the issues above.

However, you must always consider the needs of our patients, and your responsibility to them as your first priority. You should also remember that it is your duty to Speak Up about things that concern you so that we can work with you to investigate them and learn the necessary lessons to improve practice. And finally consider what might happen if you don't raise the issue and something does go wrong. Some questions which may be helpful in reaching this decision can be found in **Appendix 2**.

Things that you may wish to speak up about include:

- Healthcare matters such as suspected negligence, mistreatment or abuse of patients or issues relating to the quality of care provided.
- Concerns about the professional or clinical practice or competence of colleagues, other members of staff or other workers, including those members of staff who have non-clinical roles.
- Malpractice involving immoral, illegal, or unethical professional conduct or neglect of a professional duty.
- The treatment of yourself or other staff, including suspected harassment, discrimination or victimisation.
- Health, safety and environment issues.
- Suspicion or knowledge of theft, fraud, corruption, bribery or other financial malpractice.
- Employment standards and/or working practices.
- Criminal offences or miscarriages of justice.
- Failure to comply with any other legal obligation.
- Deliberate concealment of any of the above.

This list is not exhaustive so it is important to remember that you can speak up about ANYTHING that causes you concern.

4.2 How to Speak Up

This Freedom to Speak up Policy provides four different steps to raising a concern that are as follows:

Step One - In the first instance, you should discuss your concerns with your **work team or supervisor/line manager**. You may also speak up to governance colleagues or QI colleagues as part of the incident reporting or quality improvement process.

Step Two - If Step one is not successful or it is not possible to approach your **work team or supervisor/line manager** for any reason, you should raise the matter with a senior manager such as the **Matron, Business Manager, Clinical Manager, Head of Nursing, General Manager, Divisional Director or a Senior Manager responsible for the Directorate or Division**. You should do this as soon as possible and indicate whether or not you wish to raise the matter in confidence so that appropriate arrangements can be made.

Step Three - If the above steps have been followed, or are not possible and you still have concerns, or if you need further advice or someone else to speak to, please Speak Up in confidence to the Trust Freedom to speak Guardian on 01302 644300 or via email at dbth.guardian@nhs.net.

Alternatively you may be able to gain support and sign posting advice from the local FTSU Champion for your work area.

Step Four - If you still have concerns or feel your concern has not been dealt with appropriately you should Speak Up the **Chief Executive or the Director of People and Organisational Development or the Non-Executive Director for FTSU via the Chairman's office, Doncaster Royal Infirmary**. This can be done via telephone, email or letter.

You may also wish to gain the support of your trade union at any time in this process. Please see appendix 3.

If your concerns remain unresolved please see the section on independent advice.

4.3 What happens when I Speak Up?

When you speak up to the FTSU Guardians/Champions or any Speak UP Partner, you will be thanked for providing the Trust with an opportunity to 'Make a difference' in relation to the issue you are concerned about. You will be supported whilst we work with you to explore the situation to identify any key risks, patient or staff safety issues and future learning needs.

You will be supported to work alongside key colleagues and managers to implement the changes required in your area. This may include working with Governance and Quality Improvement services. You will also be asked to provide feedback on your experience and the support you receive.

For more information please refer to the policy flow diagram at the beginning of this document or see the detailed explanation in Appendix 4.

4.4 Feeling Safe to Speak Up

If you raise genuine concerns under this policy that you reasonably believe are in the public interest, the Trust will support you. This means that you will not be at risk of reprisal, victimisation, discrimination or any form of disciplinary sanction as a result of raising your concerns. Nor will your continued employment, opportunities for future training or promotion be prejudiced because you have raised a legitimate concern. If you are subsequently found to be mistaken, this does not matter and you will still be protected.

Whilst the Trust encourages the raising of genuine concerns, this must be exercised with proper regard to individual' and patients' rights to confidentiality and by observing the appropriate procedure for raising such concerns.

You are, therefore, reminded of your duties of confidentiality and responsibilities to the Trust. However, this does not prevent you from expressing concerns about misconduct, malpractice, risks or potential incidents. Whilst areas of concern may be raised with external bodies without first raising them with the Trust, it is the aim of this policy to encourage staff to discuss their concerns safely, with any of the internal Speak Up partners wherever possible. As long as the concern is found to be genuine and not malicious, you will always be supported.

If you raise an issue, as far as possible, your confidence will be protected. However, where disciplinary/criminal action follows, you might need to give a statement and therefore reveal your identity, but you will be informed and supported.

5 ANONYMOUS CONCERNS

The Trust cannot ignore anonymous concerns and will therefore take all reasonable steps to explore anonymous reports. However, anonymous reports are more difficult to deal with, and there can be no real report back on what has happened as a result. We would want to encourage open reporting, but it is better to anonymously report something than not report it at all. If you feel you need to make an anonymous report, it may not be dealt with under this policy specifically, but it will be investigated as thoroughly as possible and a separate log of anonymous reports will be kept in People and Organisational Development (P&OD) or in the Complaints Management Team, depending on whether it involved specific staff or not. Any action taken and outcome will be filed in these two places for future reference.

6 INDEPENDENT ADVICE

Free, independent and confidential advice on whether and how to raise a concern about serious malpractice at work can be obtained at any stage from: NHS Whistleblowing Helpline on: 08000 724725 or online at www.wbhelpline.org.uk or via email at enquiries@wbhelpline.org.uk - the

website offers specific advice for NHS staff. Additionally, advice can be sought from the relevant Trade Union or Professional Associations.

Advice can also be sought from: Care Quality Commission on 03000 616161 or via email at: enquiries@cqc.org.uk. The website offers further advice at www.cqc.org.uk.

7 DATA PROTECTION

Any personal data processing associated with this policy will be carried out under 'Current data protection legislation' as in the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2016).

For further information on data processing carried out by the trust, please refer to our Privacy Notices and other information which you can find on the trust website: <https://www.dbth.nhs.uk/about-us/our-publications/uk-data-protection-legislation-eu-general-data-protection-regulation-gdpr/>

8 TRAINING/SUPPORT

In line with the revised training guidance from the National Guardians Office (2019), all staff will receive information and advice in relation to Speaking Up and responding to concerns from a number of sources:

- Trust Policies and Procedures
- Line and or senior managers
- Fraud Awareness Training
- Other communication methods (e.g. Staff Brief/Team Meetings)

In addition staff will receive 4 levels of training appropriate to their role including:

All Staff Freedom to Speak Up Awareness Training Level 1
Role Specific Freedom to Speak Up Awareness Training Level 2 Including enabling people to speak up
Role Specific Receiving, Responding to and managing concerns
Role Specific Supporting people who speak up
Role Specific A Culture where speaking up can make a difference

9 MONITORING COMPLIANCE WITH THE PROCEDURAL DOCUMENT

Awareness and compliance with this policy will be monitored annually by the responses to the Staff Survey and additional Staff Friends and Family Test Survey.

Any concern raised by an employee under this policy must be reported, anonymously if appropriate to the Director of People and Organisational Development (P&OD). P&OD will log the name of the manager notifying the concern, the nature of the concern and the date. P&OD Case Management Team will monitor resolution of the concern and monitor trends across the Trust of such concerns.

The Director of P&OD will be responsible for monitoring that this procedure is followed and may be consulted at any stage through the process to offer advice to those involved. Data trends will be considered and analysed by the FTSU Forum with triangulated data submitted to WERC and QEC on a by monthly basis.

Reports including the key learning outcomes, trends and required actions/outcomes will be reported to Board on a 6 monthly basis.

10 EQUALITY IMPACT ASSESSMENT

An Equality Impact Assessment (EIA) has been conducted on this procedural document in line with the principles of the Equality Analysis Policy (CORP/EMP 27) and the Fair Treatment For All Policy (CORP/EMP 4). A copy is attached at Appendix 5.

The purpose of the EIA is to minimise and if possible remove any disproportionate impact on employees on the grounds of race, sex, disability, age, sexual orientation or religious belief. No detriment was identified.

11 ASSOCIATED TRUST PROCEDURAL DOCUMENTS

Key related policies for you to refer to are:-

- Fair Treatment for All Policy- CORP/EMP 4
- Equality Analysis Policy – CORP/EMP 27
- Incident Management Policy – CORP/RISK 33
- Risk Identification, Assessment and Management Policy – CORP/RISK 30
- Serious Incidents (SI) Policy – CORP/RISK 15
- Standing Financial Instructions - CORP/FIN 1 (B)
- Standing Orders- Board of Directors – CORP/FIN 1 (A)
- Disciplinary Procedure – CORP/EMP 2
- Fraud, Bribery and Corruption Policy and Response Plan – CORP/FIN 1 (D)
- Grievance and Dispute Procedure – CORP/EMP 3
- Information Management & Technology (IM&T) Security Policy – CORP/ICT 2

12 REFERENCES

- Francis Report – Duty of Care Order
- *"Freedom to Speak Up Review"*. webarchive.nationalarchives.gov.uk. Archived from the original on 2015-02-18
- Public Concern at Work, 'Speak up for a Healthy NHS' <https://www.pcaw.org.uk/protect-response-to-national-guardian-office-report-speaking-up-in-the-nhs-in-england-2018-19/>
- Public Interest Disclosure Act 1998 – www.legislation.gov.uk

APPENDIX 1 – SIR ROBERT FRANCIS – A VISION FOR RAISING CONCERNS IN THE NHS

Chapter 4 – Key themes from the evidence 91

Figure 4a - A vision for raising concerns in the NHS



APPENDIX 2 – WHAT CAN I SPEAK UP ABOUT?

Abuse of Patients

Poor Clinical Practice

Bullying and Harassment

Poor Environment or Damage to Trust Property

Fraud or Suspected Fraud

Disregard for Legislation, e.g. Health & Safety

Poor Conduct and or behaviour

A Deliberate Attempt to cover up any of these things

Or anything else that you feel is it not right or could be improved

APPENDIX 3 – WHO CAN I SPEAK UP TO?



Our **Freedom to Speak Up Guardians** are here to offer support and advice.

Alongside the Freedom to Speak Up (FTSU) guardians, there are a number of designated roles that you can also turn to if you need to raise a concern:



For further advice, or someone else to speak to, please contact the FTSU Helpline on **01302 644300** or contact the confidential email service: dbth.guardian@nhs.net

APPENDIX 4 – WHAT WILL HAPPEN WHEN I SPEAK UP?

Arranging the Initial Meeting.

The aim is for a meeting between you and whoever you chose to raise the concern with to take place within 5 working days of making a verbal or written request. The relevant manager will make the arrangements to meet promptly, with due regard to confidentiality and discretion. The option of being accompanied or represented by a trade union representative or colleague will be offered to provide support. Further contact will then be at a mutually agreed time.

The Initial meeting.

At the first meeting, the manager should:

- Thank you for raising the issue, regardless of the circumstances
- Remind you that moral support is available from your trade union or professional association
- Ask if you have a personal interest in the matter, in case the matter might be better dealt with as a grievance or appeal for example.
- Ask for your view on how the concern may best be resolved.
- Make notes which all parties involved in the initial meeting will be asked to sign as confirmation that they are an accurate reflection of the meeting that has taken place.
- Inform the Director of People and Organisational Development that the concern has been raised (anonymously if appropriate).

Initial response.

The manager will take a decision on what action to taken and agree this with you. This may take the form of an informal review, an internal inquiry or a more formal investigation involving outside bodies such as the Police or NHS Protect. If a formal investigation is launched then the Trust's Disciplinary Policy will be followed. An initial response to the individual who has raised a concern (whistleblower) will be made in writing within 5 working days of the discussion. The response will summarise the concern and set out the planned action, including who is handling the matter.

Looking into a concern.

We are committed to responding in an open and transparent way. Everyone involved should feel that matters have been dealt with thoroughly and fairly. The investigating manager may seek advice from any Executive Director depending on the nature of the concern.

Feedback to the person(s) raising concerns.

In the spirit of developing a learning culture, at the conclusion of the investigation, you will be asked for their opinion on how the concern was handled. You will also be given as much feedback as appropriate in respect of the outcome, as long as this does not infringe on the a duty of confidence owed to someone else.

Dissatisfaction with the Trust's Response.

Through this policy, we will try to respond to concerns in an open and transparent way. If you are dissatisfied with the response, you can go to other levels within the Trust, the NHS Whistleblowing Helpline (www.wbhelpline.org.uk) the relevant trade union or professional body, or the external bodies detailed below.

Informing Other Agencies/Bodies.

Whilst we encourage the raising of concerns internally, we also recognise that there may be circumstances where it is appropriate to report matters to outside agencies, including regulators or the police. We would prefer you to raise matters internally, but it is much better to raise a concern with the appropriate regulator than not at all, as long as this is in good faith and there is evidence to back up the concern. Public Concern at Work or the relevant Trade Union will be able to give advice on the circumstances in which an outside body can be contacted safely.

The regulatory bodies relevant to the NHS include:

- Care Quality Commission www.cqc.org.uk
- NHS Improvement <https://improvement.nhs.uk/>
- NHS Counter Fraud Authority <https://cfa.nhs.uk/>
- The Audit Commission www.audit-commission.gov.uk
- HM Revenue & Customs www.hmrc.gov.uk
- Health & Safety Executive www.hse.gov.uk
- The Charity Commission <https://www.gov.uk/government/organisations/charity-commission>
- The Occupational Pensions Regulatory Authority <https://www.thepensionsregulator.gov.uk/>

Reporting Fraud & Corruption.

The Trust must comply with NHS Provider Standards in respect of allegations of Fraud & Corruption and a separate policy entitled 'The Fraud, Bribery and Corruption Policy & Response Plan' exists to detail the specific action required of staff in respect of concerns of this type. Any member of staff or manager presented with a concern about fraud or corruption **must** at the earliest opportunity report their concerns in the first instance directly or indirectly to either:

- The Local Counter Fraud Specialist (LCFS)
- The Director of Finance
- NHS Fraud & Corruption Reporting Line on: 0800 028 40 60
- Online at: <https://cfa.nhs.uk/reportfraud>

The Public Interest Disclosure Act 1998 will not protect an employee who makes a rash disclosure. A rash disclosure includes reporting to the media a concern that falls within the scope of this policy that could and should have been raised within the Trust.

APPENDIX 5 - EQUALITY IMPACT ASSESSMENT PART 1 INITIAL SCREENING

Service/Function/Policy/Project/ Strategy	Division	Assessor (s)	New or Existing Service or Policy?	Date of Assessment
CORP/EMP 14 v 7 Freedom to Speak Up Policy – Speak up to make a difference	Department of People and Organisational Development	Paula Hill –Freedom to Speak Up Guardian	This policy replaces the previous Raising Concerns - We Care, We Listen, We Act – EMP 14 v 6 Whistleblowing Policy - Voicing your Concerns - CORP/EMP 14 v.5	September 2019
1) Who is responsible for this policy? Department of People and Organisational Development				
2) Describe the purpose of the service / function / policy / project/ strategy? The policy sets out the appropriate process for ‘workers’ to raise concerns about unlawful conduct, financial malpractice or dangers to the public or environment. The aim of the policy is to protect workers who raise concerns in good faith and make sure their concerns are listened to without fear that their job will be at risk for making the disclosure.				
3) Are there any associated objectives? The policy is in line with the ‘Public Interest Disclosure Act 1998’ and the NGO Guidance for Freedom to Speak Up				
4) What factors contribute or detract from achieving intended outcomes? – Detract - Staff confidence, lack of awareness of the policy and appropriate action to take. Contribute – Staff confidence, improved awareness, evidence of effective use of policy				
5) Does the policy have an impact in terms of age, race, disability, gender, gender reassignment, sexual orientation, marriage/civil partnership, maternity/pregnancy and religion/belief? No – open to all staff which includes contractors, agency workers, students or any other health care worker who has a contract of service or similar with the Trust..				
<ul style="list-style-type: none"> If yes, please describe current or planned activities to address the impact [e.g. Monitoring, consultation] – 				
6) Is there any scope for new measures which would promote equality? Monitoring of trends through the policy will be undertaken, with a specific focus on improving the experience of our BAME staff.				
7) Are any of the following groups adversely affected by the policy? No the policy is not specific to any of the 9 protected characteristics				
Protected Characteristics	Affected?	Impact		
a) Age	No	Nil		
b) Disability	No	Nil		
c) Gender	No	Nil		
d) Gender Reassignment	No	Nil		
e) Marriage/Civil Partnership	No	Nil		
f) Maternity/Pregnancy	No	Nil		
g) Race	No	Nil		
h) Religion/Belief	No	Nil		
i) Sexual Orientation	No	Nil		

8) Provide the Equality Rating of the service / function / policy / project / strategy – tick (✓) outcome box

Outcome 1 ✓	Outcome 2	Outcome 3	Outcome 4
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**If you have rated the policy as having an outcome of 2, 3 or 4, it is necessary to carry out a detailed assessment and complete a Detailed Equality Analysis form – see CORP/EMP 27.*

Date for next review: September 2022

Checked by: Tully Monk

Date: December 2019