

GUIDANCE FOR IMPLEMENTING FREEDOM TO SPEAK UP: RAISING CONCERNS ABOUT PRACTICE (INCLUDING WHISTLEBLOWING/BULLYING/HARASSMENT)

Introduction:

These guidelines are for students, the person to whom the student reports a concern and Link Lecturers.

See Flowchart for the process of raising a concern about practice Appendix 1

A. STUDENTS:

As a prequalifying student on a professional practice programme you have a professional duty to:

- put the interests of the people you care for first and to act to protect them if you feel they may be at risk; this may include raising and escalating your concerns.
- raise concerns if you experience or witness bullying or harassment

We recognise that it might not be easy for you to raise a concern. You may be unsure what to do or the process may seem quite daunting. The following guidelines link to the flow chart above and are designed to help you.

Process

It is important that concerns are raised effectively and in a timely way so that safeguarding and other issues of concern can be addressed to protect the vulnerable. You will need to raise your concerns through the local placement provider policy, including adhering to the identified timescales. The location and access to the local policy should be part of your induction to a placement. If you have not been shown this you may find the local policy on their intranet or you can ask for a copy. If you are unable to access the local placement policy this should not prevent you from raising your concern, especially if the issue is serious and people are at significant risk (you can be provided with the local policy at a later stage). If you have any difficulties contact your Link Lecturer, Placement Lead, or Programme Lead.

You are advised to seek support at the earliest opportunity in the interest of public protection, and to see through any process to its conclusion. **If there is an immediate risk of harm, it is important that you report your concerns without delay to an appropriate person¹.**

1a) Support and help available

We recommend you seek independent confidential advice at any stage in the process. Independent confidential advice is available from the following sources:

- Your professional statutory regulatory body and professional associations:
 - [Nursing & Midwifery Council \(NMC\)](#)
 - [Health and Care Professions Council \(HCPC\)](#)
 - [The Chartered Society of Physiotherapy \(CSP\)](#)
 - [Royal College of Occupational Therapists \(COT\)](#)
 - [Social Work England](#)

¹ N.B. For social work students, this would normally be either your supervisor and/or the safeguarding nominated lead. You will need to refer to your local agency safeguarding policy

- [College of Paramedics \(COP\)](#)
- [The Royal College of Nursing \(RCN\)](#)
- [The Royal College of Midwives \(RCM\)](#)

- National helplines:

- [Bullying in NHS: how to stop it?](#)

(<http://www.nhs.uk/Livewell/Bullying/Pages/Antibullyinghelp.aspx>)

- [The National Bullying Helpline](#)

(<http://www.nationalbullyinghelpline.co.uk/>)

- Professional trade unions

You may also seek advice and support from your professional trade union

If you are worried about reporting your concerns (including making a formal statement), please seek support from your Link Lecturer immediately. The process will be dealt with confidentially, and only shared with other identified appropriate personnel. However, you will **not** be able to remain anonymous within this process, because your details will be required for an effective investigation to take place. In some cases it may be appropriate to change your placement to aid any investigation, and to protect your confidentiality You will be offered support throughout this process from the link lecturer and/or Academic Advisor and in addition you can contact Student Support Co-ordinators, student support services and/or occupational health.

If you are worried about reprisals from reporting your concerns, and you have discussed with your Link Lecturer, you may decide to report anonymously to the NHS and social care confidential helpline on 08000724725.

N.B. Please be aware of the importance of absolute confidentiality. You must not discuss the case with anyone except an identified investigator or advisor (e.g. Student Support Co-ordinators on <http://www.hls.brookes.ac.uk/student-support-coordinators> or email on studentsupport-marston@brookes.ac.uk or University Student Union on <https://www.brookes.ac.uk/studying-at-brookes/living/brookes-union/>) and you must not interfere in any way with any investigation or personnel involved.

1b) *Points to consider for each stage of the process*

- Consider working through the following questions:
 - What happened? You will need to be able to accurately describe what you saw and heard, what was said and what you did at the time and immediately afterwards.
 - Who was involved?
 - Can you ask for their perspective?
 - Avoid making accusations – ask questions and express your own concerns, perspective and feelings
 - Were there any additional influences (context, environment, previous issues, and your own previous experience) that are relevant?
 - How do you interpret this?
 - How sure are you of your interpretation?
 - Could your perspective be incomplete?
 - What alternative explanations could there be?
 - Make some brief notes, including dates, names and times (you will need these to refer to when you are writing a formal statement of events/witness statement). **Ensure these notes are kept secure and confidential.**

1c *Reflect on your own learning*

- After your concerns have been raised and actioned and resolved, identify lessons learned/ outcomes/further action:
- You should expect to receive feedback as to the outcome of any investigation. Your Link Lecturer will help you consider lessons learned and identify further feedback needed. This will either conclude a satisfactory outcome OR may identify the need to escalate to nextstage.
- You may wish to reflect and debrief further about this experience using relevant support mechanisms such as your Link Lecturer or Student Support services.
- Consider any development needs you may still have (e.g. understanding professional accountability, statement writing, completing incident forms and presenting information). The flow chart (above) will have provided a reference for you to be supported effectively whilst addressing the concern.

B. THE PERSON TO WHOM THE STUDENT REPORTS A CONCERN AND LINK LECTURERS

What should you do?

- Listen and offer support
- Clarify the issue **N.B.** If the issue concerns patient/client/child/service user safety, you **must** apply the local placement provider policy immediately

- Decide which local placement provider policy applies to the issue raised (e.g. Bullying and Harassment, Raising a Concern, Freedom to Speak Up).
- Refer to others as appropriate:
 - University roles: Link Lecturer, Placement Lead, Programme Lead, Academic Advisor,
 - Placement staff: practice assessor/supervisor¹, team leader, placement co-ordinator, manager, Learning Environment Lead or equivalent)
- Identify other additional resources to support the student and yourself through the process (such as occupational health and wellbeing and/or counselling services)
- Consider your role and take action in accordance with local policy and the relevant Professional Statutory Regulatory Body requirements
- Seek, identify and document actions required (allocating responsibility and deadlines and monitoring processes)
- You need to inform the Link Lecturer for the placement area, even if the issue is resolved locally. This is to help ensure that the student learns effectively from the experience, and so the Link Lecturer can continue to assure the quality of the placement.
- If you are the Link Lecturer, you will need to provide support for the student in writing a witness statement. It is important to discuss with the student, the need to seek independent and/or legal advice.

Additional Useful Links:

Further information is available on the following links:

- Care Quality Commission <https://www.cqc.org.uk/contact-us/report-concern/report-concern-if-you-are-member-staff>
- Ofsted <http://www.ofsted.gov.uk/contact-us/whistleblower-hotline>
- Protect (Formerly Public Concern at Work): <https://protect-advice.org.uk/our-story/>
- Livewell <https://www.nhs.uk/conditions/stress-anxiety-depression/bullying-at-work/>
- Workplace bullying and harassment <https://www.gov.uk/workplace-bullying-and-harassment>

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¹ practice assessor/supervisor means the person/people identified to support the student in practice. For example for nursing and midwifery this means Practice Assessor and Practice Supervisor, for paramedics, this is the clinical mentor, for OT, -practice educator, for physiotherapy – clinical educator.

Appendix 1 Flowchart for the process of raising a concern about practice

