Policy Title: Raising Concerns Policy

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<td>Policy Author</td>
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Cumbria Partnership NHS Foundation Trust | North Cumbria University Hospitals NHS Trust
SUMMARY & AIM

This policy has been developed to ensure that the Trust has a process for staff to raise concerns about services provided, the standards applied, patient safety, criminal offences, financial malpractice or any other serious risks and to be protected from victimisation for doing so. It complies with employment legislation and good practice.

TARGET AUDIENCE:

This policy covers anyone who works or has worked at Cumbria Partnership NHS Foundation Trust and North Cumbria University Hospitals NHS Trust, including self-employed, volunteers, bank/agency/locum workers, students and governors.

People who work for contract organisations, agency workers, locums, students/trainees on placement, self-employed NHS Professionals and volunteers.

TRAINING:

Information about Speaking up and raising concerns is provided at Corporate Trust Induction

Other awareness sessions for staff teams can be arranged, please discuss with the Speak up Guardian

Information and contact details are available on the Intranet

KEY REQUIREMENTS

1. Where an individual has a concern about any malpractice they should report it straight away. If your concern is about fraud and corruption or bribery you must contact the local Counter Fraud Specialist on 0191 4415936 or NHS Counter Fraud Authority, 0800 028 40 60 (powered by Crimestoppers) Online: https://cfa.nhs.uk/reportfraud.

2. If you have a concern about a risk, malpractice or wrong doing at work, wherever possible raise it with your line manager or lead clinician.

3. If this is not possible please contact a Quality & Safety Lead within Care Groups, Executive Director of Nursing, Medical Director, Trust Board Member, Non-Executive Director or a Freedom to Speak up Guardian. (The person you spoke to will then conduct internal enquiries and progress any actions required.)

4. Guidance is available from your Trade Union, Professional body or Free National Speak up Helpline (08000 724 725)

5. The reporter will receive feedback about the actions being taken, however, the Trust may not be able to tell of the precise action where this would infringe a duty of confidence owed to someone else.
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SUMMARY FLOWCHART: – RAISING CONCERNS

**Raising a Concern:**
Contact Local Counter Fraud Specialist for concerns about fraud, bribery or corruption. Raise other concerns re risk, malpractice or wrongdoing with line manager or lead clinician where possible. If feel unable to raise with manager contact a Board Member or Trust Freedom to Speak up Guardian.

**How the matter will be handled:**
The manager or lead clinician, Board Member or Guardian will meet the individual to assess the situation and ensure appropriate action. Initially internal enquiries will be made. If required an informal/formal investigation will be carried out. The employee will be kept up to date with progress.

**Advice:**
Advice can be sought from HR, Trust Guardians, Executive Directors, Non Exec Directors, Trade Unions, Professional or Regulatory Bodies, and National NHS Speak up Helpline.

**External contracts:**
Guidance and contact details are provided for external bodies and regulators. Guidance is provided on communication with the media to take into account confidentiality requirements.
PROCEDURE

Process for raising a concern - you should always seek to resolve your concern informally

You have a concern you would like to raise

Read through the Freedom to Speak up Policy so you are aware of the process and what is covered under whistleblowing law (section 6 of the policy confirms other arrangements available within the Trust)

Can you raise your concern with your Line Manager or Clinical Lead?

Yes

Discuss the concern informally to see if the issue can be resolved

Resolved

No

Raise the concern with the Freedom to Speak up Guardian

Receive acknowledgement within 48 hours

Issue resolved informally

The person you raised the concern with will undertake an assessment of what other action has been taken, if any, and identify a trained individual to undertake a fact finding process including timescales, in line with Trust process

You will receive regular feedback throughout the fact finding process

You will be given feedback once the fact finding process is complete

A designated support person will be assigned to you to guide you through the process

If you are not satisfied with the process undertaken by the Trust you can contact the National Guardian Freedom to Speak Up, at www.qpc.org.uk/content/national-guardian-office or by phone on 03000675900

You should seek to highlight your concern within your organisation informally where possible. Advice and support is available throughout this process. You can contact your trade union, Human Resource Team link, professional regulator, professional body or one of the Freedom to Speak up Guardians or independent advice can be sought through the National Speak up Helpline on 0800 072 4725.

RAISING A PUBLIC INTEREST CONCERN.

A public interest concern may include where:

- Someone’s health and or safety has been put in danger because of an action or inaction
- Damage has been caused to the environment
- A criminal offence has been committed
- An employee fails to obey the law (such as not having appropriate insurance)
- A malpractice or wrong-doing has been covered up
1. **INTRODUCTION**

This ‘standard policy’ was one of a number of recommendations of the review by Sir Robert Francis into speaking up in the NHS.

The Trust is committed to delivering high quality care to its patients and expects high standards from its workers. All workers in the NHS have a contractual right and duty to raise genuine concerns they have with their employer about malpractice or any other serious risk they consider to be in the public interest.

The Trust has an obligation and duty of care to identify malpractice and to take appropriate measures. The policy explains what steps the Trust takes to support an open culture which encourages individuals to raise their concerns at an early stage.

The policy (produced by NHS Improvement and NHS England) has been adopted by Cumbria Partnership NHS Foundation Trust and North Cumbria University Hospitals NHS Trust to help staff feel supported to raise concerns for the benefit of all patients and staff.

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 Policy, our Senior Leaders and entire Board are committed to an open and honest culture. We will look into what you say and you will always have access to the support you need.

In many circumstances the easiest way to get your concern resolved will be to raise it with your Line Manager (or Lead Clinician).

2. **PURPOSE**

This policy provides guidance for staff who have concerns about what is happening at work, or where concerns already raised have not been dealt with appropriately. This policy provides detail about how we will look into a concern, which in many circumstances may be resolved by raising it with your Line Manager, Lead Clinician or one of the Trust’s Freedom to Speak Guardians.

Whistleblowing is a term often used where a person in the Trust raises a concern about the conduct of others in the Trust or the way in which the Trust is run. It is linked to the Public Interest Disclosures Act in 1998 (often called the ‘whistleblowing law’) which provides protection for whistleblowers who report concerns about the wrongdoing in the workplace. Whistleblowers are protected from dismissal and suffering any detriment for having ‘blown the whistle’.

The Trust’s Values and Behaviours’ Framework defines clear expectations about our values and the behaviours at work that contribute to delivering “a new integrated health and care system, using our collective capabilities for a healthier and happier population. Employees of the Trust should ensure all their actions contribute to a safe, respectful and professional working environment.
3. POLICY DETAILS

3.1 What Concerns can I raise?
You can raise a concern about risk, malpractice or wrong-doing. Just a few examples of this might include (but are by no means restricted to):

- unsafe patient care
- unsafe working conditions
- inadequate induction or training for staff
- lack of, or poor, response to a reported patient safety incident
- suspicions of fraud (which can also be reported to our local counter-fraud team by phone on 0191 4415926 via email: counterfraud@audit-one.co.uk or NHS Counter Fraud Authority on 0800 028 40 60
- a bullying culture (across a team or organisation rather than individual instances of bullying).

For further examples, please see the Health Education England video on YouTube. https://www.youtube.com/watch?v=zjau1Ey0di8

Remember that if you are a healthcare professional you have a professional duty to report a concern and we all have an ethical duty to speak up. **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 (see Section 7 for details).

3.1.1 Feel Safe to Raise Your Concern

This policy is in place to reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have at an early stage so that appropriate action can be taken. Rather than wait for proof we would prefer you to raise the matter when it is still a concern.

The Trust Board and Chief Executive are committed to this policy. If you raise a concern under this policy and you have a reasonable belief that your disclosure is in the public interest, you will not be disadvantaged or placed at any risk of any detriment. It does not matter if you are mistaken.

We will treat your concern seriously and act according to this policy. The Trust will not tolerate the harassment or victimisation of anyone raising a concern under this policy. Bullying and harassment of someone raising concerns could lead to disciplinary sanctions in line with the Trust Disciplinary Procedure and/or Dignity and Respect at Work Policy which must be referred to in conjunction with this policy where appropriate.

You may wish to discuss the matter in confidence; if so please inform the person who will be following up your concern at the outset. If you ask for your identity to be protected, it will not be disclosed without your consent unless required by law. If the
situation arises where the Trust is not able to resolve the matter without revealing your identity (for instance because evidence is needed in court) the way forward will be discussed with you.

The Trust will consider anonymous reports; however it becomes much more difficult to look into the matter, to protect your position or give you feedback.

Protection under this policy will not apply to someone who maliciously raises a matter they know is untrue, or where the disclosure of the information itself amounts to a criminal offence

3.1.2 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.

3.1.3 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 agency workers, temporary workers, students, volunteers and governors.

3.1.4 Who Should I Raise My Concerns with?

In many circumstances the easiest way to share your concern will be to raise it with your Line Manager (or Lead Clinician). But where you don’t think it is appropriate to do this, you can use any of the options set out below in the first instance.

If raising it informally with your Line Manager (or Lead Clinician) does not resolve matters, or you do not feel able to raise it with them, you can contact one of the following people and raise your concern formally:

- One of our Freedom to Speak up Guardians via freedomtospeakup@ncuh.nhs.uk or by phone 07990540044 / 07775 542 207. This is an important role identified in the Freedom to Speak Up review to act as an independent and impartial source of advice to staff at any stage of raising a concern, with access to anyone in the organisation, including the Chief Executive, or if necessary, outside the organisation. A list of the Trust’s Freedom to Speak Up Guardians and Ambassadors is accessed via the intranet.

If you still remain concerned after this, you can contact:

- our lead with responsibility for raising concerns/speaking up Daniel Scheffer, Company Secretary by phone on 07979 803386 or via Email Daniel.Scheffer@Cumbria.nhs.uk
• our Non-Executive Director with responsibility for raising concerns/speaking up George Liston, via Email: George.Liston@ncuh.nhs.uk

All these people have been trained in receiving concerns and will give you information about where you can go for more support.

If for any reason you do not feel comfortable raising your concern internally, you can raise concerns with external bodies – see Appendix 2.

3.1.5 Advice and Support

You can also contact the Speaking Up Helpline for the NHS and social care on 08000 724 725, your professional body or trade union representative – see Appendix 2 for details.

3.1.6 How Should I Raise My Concern?

You can raise your concerns with any of the people listed above in person, by phone or in writing (including email). Whichever route you choose, please be ready to explain as fully as you can the information and circumstances that gave rise to your concern.

3.1.7 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. The process for raising concerns is set out within the flowcharts contained within this policy.

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 as soon as possible, preferably within two 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.

An example process for raising concerns is provided at Appendix 3.

3.1.8 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 report that focuses on identifying and rectifying any issues, and learning lessons to prevent problems recurring. You may be called as a witness to any investigation undertaken.
There will be a right of appeal to any outcome resulting from an investigation.

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.

If your concern suggests a Serious Incident has occurred, an investigation will be carried out in accordance with the Serious Incident Framework. Any employment issues (that affect only you and not others) identified during the investigation will be considered separately.

In all circumstances, the Trust will aim to complete the investigation within 45 days of the initial meeting with you.

3.1.9 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 the investigation to take and keep you up to date with its progress. Wherever possible, we will share the full investigation report with you (while respecting the confidentiality of others).

3.1.10 How Will We Learn From Your Concerns?

The focus of the investigation will be on improving the service we provide for patients. 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.

3.1.11 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. The Trust’s Quality Improvement and Safety Committee will receive details of concerns raised together with an update of progress against ongoing investigations, details of new concerns raised within the preceding month and final reports.

The Quality Improvement and Safety Committee will be advised of the actions resulting from any investigation into concerns raised in accordance with this policy. Action notifications will provide the opportunity for the Quality Improvement and Safety Committee to triangulate investigation outcomes with other sources of assurance.

3.1.12 Review

We will review the effectiveness of this policy at least annually, with the outcome published and changes made as appropriate. The review will be undertaken by the Audit & Risk Committee who will gain annual assurance by monitoring the use and effectiveness of the policy as specified within section 5.
3.1.13 Raising Your Concern with an Outside Body

Alternatively, you can raise your concern outside the organisation with:

- NHS Improvement on 0300 123 2257 for concerns about:
  - how NHS trusts and foundation trusts are being run
  - other providers with an NHS provider license
  - NHS procurement, choice and competition
  - the national tariff

- Care Quality Commission on 03000 616161 for quality and safety concerns

- NHS England on 0300 311 22 33 for concerns about:
  - primary medical services (general practice)
  - primary dental services
  - primary ophthalmic services
  - local pharmaceutical services

- Health Education England on 0115 823 3300 for education and training in the NHS

- NHS Counter Fraud Authority on 0800 028 40 60 for concerns about fraud and corruption.

3.1.14 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). There is also a defined list of ‘prescribed persons’, similar to the list of outside bodies set out in Appendix 2, who you can make a protected disclosure to. To help you consider whether you might meet these criteria, please seek independent advice from the Whistleblowing Helpline: http://www.wbhelpline.org.uk/ for the NHS and social care, Public Concern at work or a legal representative.

3.1.15 National Guardian Freedom to Speak Up

The National Guardian can independently review how staff have been treated having raised concerns where NHS trusts may have failed to follow good practice, working with some of the bodies listed in Appendix 2 to take action where needed.

3.1.16 Fraud, Bribery and Corruption

The Trust takes fraud and corruption very seriously. All cases of actual or suspected fraud and corruption will be vigorously and promptly investigated and appropriate actions will be taken. Any cases of fraud and corruption will ordinarily be investigated by the Trust’s Local Counter Fraud Specialist in accordance with the Trust’s Counter Fraud, Bribery and Corruption (Joint) Policy.

The Trust fully appreciates that the employee may be concerned about issues of confidentiality. In every case the Trust will take reasonable steps to respect individual
confidentiality as far as reasonably practicable. Where you have an honest and reasonable suspicion that fraud or corruption has occurred, is occurring or is likely to occur, any concerns can be raised directly with the Trust’s Local Counter Fraud Specialist, whose contact details are available in Appendix 2 of this Policy.

4. **TRAINING**

Information about Speaking up and raising concerns is provided at Corporate Trust Induction.

Awareness sessions for staff teams can be arranged, please discuss with the Speak Up Guardian. Information and contact details are available on the Intranet.

5. **PROCESS FOR MONITORING COMPLIANCE**

The process for monitoring compliance with the effectiveness of this policy is as follows:

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<tr>
<th>Aspect being monitored</th>
<th>Monitoring Methodology</th>
<th>Reporting Presented by</th>
<th>Reporting Committee</th>
<th>Frequency</th>
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<td>Policy Awareness by staff</td>
<td>online survey of a representative sample of staff</td>
<td>Company Secretary</td>
<td>Audit &amp; Risk Committee</td>
<td>Annual</td>
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<tr>
<td>Concerns investigated within policy standards</td>
<td>Review of investigation records related to formal concerns</td>
<td>Company Secretary</td>
<td>Audit &amp; Risk Committee</td>
<td>Annual</td>
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Wherever the above monitoring has identified deficiencies, the following must be in place:

- Action plan
- Progress of action plan monitored by the Audit & Risk Committee minutes
- Risks will be considered for inclusion in the appropriate risk registers

6. **REFERENCES:**

Public Interest Disclosure Act, 1998
Equality Act, 2010
Freedom of Information Act, 2000
Report of the Mid Staffordshire NHS Foundation Trust Public Inquiry, February 2013

7. **ASSOCIATED DOCUMENTATION:**

Safeguarding Policy
Being Open and Duty of Candour Policy and Procedure
Handling of Complaints, Comments, Concerns & Compliments Policy
Incident and Serious Incidents that Require Investigation Policy
Counter Fraud, Bribery and Corruption Policy
8. **DUTIES (ROLES & RESPONSIBILITIES):**

8.1 **Chief Executive / Trust Board Responsibilities:**

The Chief Executive and Trust Board jointly have overall responsibility for the strategic and operational management of the Trust, including ensuring that Trust policies comply with all legal, statutory and good practice requirements.

8.2 **Executive Director Responsibilities: Chief Executive Officer**

All policies have a designated Executive Director and it is their responsibility to be involved in the development and sign off of the policies, this should ensure that Trust policies meet statutory legislation and guidance where appropriate. They must ensure the policies are kept up to date by the relevant author and approved at the appropriate committee.

8.3 **Managers Responsibilities:**

All managers and supervisors have a responsibility to ensure that all workers are aware of this policy, to promote a culture of openness and take appropriate action as set out in the policy when a concern is raised.

8.4 **Staff Responsibilities:**

All staff must work with each other to create a culture of openness and accountability.

Where an individual has a concern about any malpractice they must report it straight away to the appropriate individual as outlined in the policy. The worker making the disclosure must have a “reasonable belief” that the disclosure is “in the public interest” (it may not exclude complaints by workers about their employment contract being breached if what they complain of is an example of a wider unlawful practice). This concern may or may not be made in good faith.

All staff are responsible for co-operating with the development and implementation of Trust policies as part of their normal duties and responsibilities. They are responsible for ensuring that they maintain up to date awareness of corporate and local policies with regard to their own and their staff roles and responsibilities.

8.5 **Approving Committee Responsibilities: Board of Directors**

The Board of Directors is responsible for the approval of this policy. The Chair will ensure the policy approval is documented in the final section of the Checklist for
Policy Changes. The Board of Directors will agree the approval of the final draft of the policy.

9. **ABBREVIATIONS / DEFINITION OF TERMS USED**

Keep lists in alphabetical order

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<tr>
<th>ABBREVIATION</th>
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<td>FTSU</td>
<td>Freedom To Speak Up Guardian</td>
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<td>HR</td>
<td>Human Resources</td>
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<th>DEFINITION</th>
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<td>Freedom to Speak up Guardian</td>
<td><strong>Freedom to Speak Up Guardians help:</strong></td>
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<td>□ Protect patient safety and the quality of care</td>
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<td></td>
<td>□ Improve the experience of workers</td>
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<td>□ Promote learning and improvement</td>
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<td>□ Workers are supported in speaking up</td>
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<td>□ Barriers to speaking up are addressed</td>
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<td>□ A positive culture of speaking up is fostered</td>
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<td></td>
<td>□ Issues raised are used as opportunities for learning and improvement</td>
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<tr>
<td>Freedom to Speak up Ambassador</td>
<td>Freedom to Speak up Ambassadors support the role of the Freedom to Speak up Guardian by raising awareness and helping to promote a positive culture of speaking up</td>
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A vision for raising concerns in the Trust

Source: Sir Robert Francis QC (2015) Freedom to Speak Up: an independent report into creating an open and honest reporting culture in the NHS.
APPENDIX 1 – THE TRUST’S FREEDOM TO SPEAK UP GUARDIANS MAY 2019:

The Trust has appointed the following members of staff as Freedom to Speak Up Guardians:-

Catherine Bird
Richard Heaton

To contact one of the Freedom to Speak Up Guardians or Freedom to Speak Up Ambassadors, please e-mail

freedomtospeakup@ncuh.nhs.uk
## APPENDIX 2 – CONTACT DETAILS

### Internal

Trust Raising Concerns/Speaking Up:
George Liston – Non-Executive Director
CPFT and NCUH
Email: George.Liston@ncuh.nhs.uk

Company Secretary (Daniel Scheffer)
Email: Daniel.Scheffer@cumbria.nhs.uk
Tel 07979 803386

The Local Counter Fraud Specialist (LCFS)
Tel: 0191 4415936
Email: counterfraud@audit-one.co.uk

Trade Unions – Convener - Dave Waddington 0755-2216331

### External

National Speak up Helpline
https://speakup.direct/
Tel: 08000 724 725

Protect
http://www.pcaw.co.uk/
Tel: 020 7462 6690

National Guardian Freedom to Speak Up
http://www.cqc.org.uk/content/national-guardians-office
Tel: 0300 067 9000

NHS Counter Fraud & Corruption Reporting Line
https://www.reportnhsfraud.nhs.uk/
Tel: 0800 0284060

NHS Improvement
https://improvement.nhs.uk/
Tel: 0300 123 2257
Email: hnsi.enquiries@nhs.net

Care Quality Commission
www.cqc.org.uk/
Tel: 03000 616161

NHS England
www.england.nhs.uk
Tel: 0300 311 22 33

Health Education England
https://hee.nhs.uk/
Tel: 0115 823 3300

Health & Safety Executive
www.hse.gov.uk
Tel: 0845 345 0055

Health Professional Council
www.hpc-uk.org
Tel: 020 7582 0866
APPENDIX 3 – EXAMPLE PROCESS FOR RAISING AND ESCALATING A CONCERN:

Step one
If you have a concern about a risk, malpractice or wrong-doing at work, we hope you will feel able to raise it first with your Line Manager or Lead Clinician. This may be done orally or in writing.

Step two
If you feel unable to raise the matter with your Line Manager or Lead Clinician, for whatever reason, please raise the matter with our local Freedom to Speak Up Guardians via e-mail at freedomtospeakup@ncuh.nhs.uk 07775542207 / 07990540044

A list of the Trust’s Freedom to Speak Up Guardians is available on the intranet.

The Freedom to Speak Up Guardians has been given special responsibility and training in dealing with Speaking up concerns. They will:

• treat your concern confidentially unless otherwise agreed
• ensure you receive timely support to progress your concern
• escalate to the board 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.

If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made.

Step three
If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact

• our lead with responsibility for speaking up / raising concerns Daniel Scheffer, Company Secretary by phone on 07979 803386 or via Email Daniel.Scheffer@Cumbria.nhs.uk
• our Non-Executive Director with responsibility for speaking up/raising concerns George Liston, via Email: George.Liston@ncuh.nhs.uk

Step four
You can raise concerns formally with external bodies in Appendix 2.

You should expect to receive acknowledgement of your concern at the earliest possible date from receipt and be assured that your concern is being looked into. Throughout any process whether it is an informal fact finding process or an investigation you will receive regular updates on progress.
DOCUMENT CONTROL

Equality Impact Assessment Date

Sub-Committee & Approval Date
Board of Directors 27/06/2019

History of previous published versions of this document:

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<th>Disposal Date</th>
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<tbody>
<tr>
<td>NCUH</td>
<td>Ref HR 08 Version 11</td>
<td>08.03.17</td>
<td>31.03.19</td>
<td>10.03.17</td>
<td>Mar 19</td>
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<tr>
<td>CPFT</td>
<td>POL/004/007</td>
<td>13.04.17</td>
<td>March 2020</td>
<td>April 17</td>
<td>Mar 21</td>
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Statement of changes made from previous version

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Section &amp; Description of change</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.1</td>
<td>May 2019</td>
<td>• Combined the NCUH Raising Concerns/Whistleblowing Policy (HR 08) and CPFT Raising Concerns Policy 004/007</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• Added Key Requirements section from the NCHT policy, as CPFT did not have one</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• In Key Requirements Section, Changed Title of Whistleblowing Helpline to Speak up Helpline</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• Summary Flowchart added from NCUH Policy and amended</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• Introduction section was the old Purpose section in previous CPFT policy</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• Process Flowchart amended to remove whistleblowing reference and replace with Speak up</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• Where the term ‘genuine concern’ was included, the word genuine has been removed, as staff should feel they can report any concern</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• Information added to section 3.1.1 has been taken from the NCUH Policy as this was more detailed regarding reassurance and support for staff</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• Training details have been added to section 4</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• Managers responsibilities added to section 7.3 taken from NCUH Raising Concerns/Whistleblowing Policy (HR 08)</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• Staff Responsibilities added to section 7.4 taken from NCUH Raising Concerns/Whistleblowing Policy (HR 08)</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• Policy titles and reference numbers updated in section 6</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• Appendix 2 Contact details and web links updated</td>
</tr>
<tr>
<td></td>
<td>May 2019</td>
<td>• Appendix 3 details updated</td>
</tr>
<tr>
<td>0.2</td>
<td>June 2019</td>
<td>• Term ‘whistleblowing’ replaced with speaking up/raising concerns- Appendix 2/3 and 3.1.4</td>
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<tbody>
<tr>
<td>June 2019</td>
<td>• Ambassador details removed and replace with comment to access intranet for up to date details</td>
<td></td>
</tr>
<tr>
<td>June 2019</td>
<td>• Contact details updated as more recently joint inbox replaced separate trust inboxes</td>
<td></td>
</tr>
</tbody>
</table>

List of Stakeholders who have reviewed the document

<table>
<thead>
<tr>
<th>Name</th>
<th>Job Title</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Linda Turner</td>
<td>Quality &amp; Safety Lead Specialist Services</td>
<td>May 2019</td>
</tr>
<tr>
<td>Daniel Scheffer</td>
<td>Company Secretary</td>
<td>May 2019</td>
</tr>
<tr>
<td>Catherine Bird</td>
<td>Freedom To Speak Up Guardian (CPFT and NCUH)</td>
<td>June 2019</td>
</tr>
<tr>
<td>Louise Nelson</td>
<td>Chair of Quality &amp; Safety Committee (NCUH)</td>
<td>June 2019</td>
</tr>
<tr>
<td>Jeff O’Neill</td>
<td>Chair of Audit &amp; Risk Committee (NCUH)</td>
<td>June 2019</td>
</tr>
<tr>
<td>Brian Hetherington</td>
<td>Chair of Audit &amp; Risk Committee (CPFT)</td>
<td>June 2019</td>
</tr>
<tr>
<td>George Liston</td>
<td>Freedom to Speak Up/Raising Concern NED Lead (NCUH/CPFT)</td>
<td>June 2019</td>
</tr>
<tr>
<td>Care Groups/Support Services</td>
<td>Compliance Board members (NCUH/CPFT)</td>
<td>June 2019</td>
</tr>
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