



## **Raising and Escalating Concerns Policy and Procedure: NMC/ HCPC approved programmes**

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## 1.0 Introduction

1.1 The policy offers guidance to students, academic and practice staff to support them in raising complaints/concerns that may arise in practice placements.

Northumbria University works closely with a number of partnership Trusts and private, voluntary and independent organisations (PIVOs) and it is recognised that the vast majority deliver care that is of a very high standard, and provide excellent learning opportunities for students. However, there may be occasions when care is not of an acceptable standard.

1.2 The policy is relevant to all practice placement areas and the people who work or study in them and complies with the Public Interest Disclosure Act 1998. All staff and students should be aware of their role and responsibility in highlighting or communicating issues or concerns that present risks to an organisation, its staff, service users or students on placement within the host organisation. (HCPC 2019, Francis 2015, NHS 2016, NMC 2018a, NMC 2018b,).

1.3 This policy applies to all programmes in the Faculty of Health & Life Sciences that lead to professional registration with the Health and Care Professions Council (HCPC) or Nursing and Midwifery Council (NMC) and include learning in practice as part of the programme. It has been developed in collaboration with practice placement providers.

1.4 Professional codes require that concerns raised are managed in a timely manner in order to minimise risk or limit the potential for future risk.

- You must act without delay if you believe that there is a risk to patient safety or public protection
- You are obligated to raise concerns in relation to danger or risk to health and safety of both service users and staff
- You must act without delay if you believe that you, a colleague or anyone else may be putting someone at risk
- You must adhere to the facts at all times

Examples of where you will need to raise a concern may include:

- Issues regarding care delivery by any health care professional or employee
- Safeguarding concerns regarding children or vulnerable adults
- Issues relating to the environment of care
- Evidence of sub-standard care or mal-practice

This is not an exhaustive list and your personal tutor can support you if you are unsure whether to raise a concern in any given situation.

## 2.0 Support available for students during the process of raising a concern

It is recognised that raising a concern can be an uncomfortable experience for both staff and students. It is however important to recognise that failure to do so may result in unnecessary harm to patients. The university will undertake to ensure that support is available throughout this process. No detrimental action of any kind will be taken against a student making a complaint or raising an issue, provided that it is done in good faith and without malice. A malicious or vexatious complaint however, may result in disciplinary action.

The support available to students includes

- Student support and wellbeing services



- Personal Tutor who will provide support writing statements and during any subsequent interview by the placement provider
- Faculty lead for Raising Concerns and Programme Lead
- Students' Union
- GP services

### 3.0 Confidentiality

When raising a concern about a practice placement provider, the university cannot guarantee anonymity for the student or academic raising concerns. This is because each concern will need to be fully investigated. You may wish to seek advice from your student union representative during this process.

### 4.0 Process and Procedure (Appendix 1)

*Some concerns may be serious enough to warrant omission of Stage 1 and 2 and lead to direct escalation to Stage 3 – Formal Investigation. If you are unsure about the severity of your concern and would like to discuss it with a third party, you may contact a safeguarding manager within the NHS Trust or Local Authority who will always be prepared to discuss concerns and actions required.*

#### 4.1 Stage 1: Raising your initial concern

If you witness or suspect there is some wrongdoing or malpractice taking place or about to take place, it is important to discuss the issue informally with a senior member of staff such as your supervisor/educator, the nominated education lead (NMC 2018c) and / or personal tutor. They will help you think about what has happened and help you decide if there is a genuine problem.

The aim of this early informal discussion is to promote local resolution. Both the health professional and student should also document this discussion within the student's Practice Assessment Document.

If the issue is resolved at this stage, **no further action is required.**

#### 4.2 Stage 2: Formal exploratory meeting

If the concern/issue cannot be resolved locally, a formal exploratory meeting must be arranged. The meeting will normally be convened by the PPF or Practice Education Facilitator and should include:

- the student,
- Personal tutor
- Practice supervisor / educator or nominated education lead for the area.
- In some instances, the Programme Lead and/or the Faculty Lead for Fitness to Practise may be required to attend.

The concern will be explored and discussed fully. This meeting should be documented within the student's Practice Assessment Document. If there has been a breakdown in relationships, the matter may be resolved through mediation.



The exploratory meeting may decide there is no case to answer and further action is not justified – the reason for this decision must be made clear to you.

The case may be serious enough to warrant a direct escalation to **Stage 3 – Formal Investigation.**

#### **4.3 Stage 3: Formal Investigation**

If the concern / complaint has not been resolved at stage 1 or stage 2, the member of staff with whom you discussed your concerns will immediately inform the Faculty Lead for Raising Concerns. The Faculty Lead for Raising Concerns will then inform the Senior Manager, with responsibility for education, in the NHS Trust or PIVO and Practice Placement Facilitator.

The placement provider may need to invoke organisational policies and procedures as deemed appropriate. The Trust may be required to conduct further investigations and involve external parties: for example, CQC and / or Police.

If the situation is resolved at this stage, no further action is required. If you are unhappy with what is decided, please discuss this with your personal tutor and Practice Placement Facilitator. Where applicable, you should follow local trust and Local Authority guidance on safeguarding and whistleblowing procedures.

**It may be necessary to change a student placement while an investigation is ongoing. This decision will be made collaboratively with the student, Practice Placement Facilitator and the Programme Lead and / or Faculty Lead for Raising Concerns.**

#### **4.4 Debriefing following the process**

It is recognised that students who raise a concern will be interested in the outcome. It is likely that full details of the outcome following investigation will not be disclosed to the person raising the concern for reasons of confidentiality in line with the GDPR (2018). It is however good practice to provide an opportunity to debrief the student following on from this process and provide an opportunity for structured reflection in order to promote professional development. This may involve a meeting with any of the following as deemed appropriate: the Personal Tutor, Programme Lead, Faculty Lead for Raising Concerns, Practice Education Facilitator, Practice Placement Facilitator, Placement Manager. This is not an exhaustive list and will be determined by the nature of each individual case.

#### **5.0 Request to interview a student**

If a representative from the placement area wishes to interview the student, permission must be sought from the Faculty Lead for Raising Concerns by email.

In some circumstances, it may be necessary to interview a student immediately (in case of police investigation for example). However, should a placement provider feel the need to take immediate action, the University must be notified as soon as possible and no later than the next working day.

## 6.0 Guidance on completing statements

- Your statement must be clear and concise
- Avoid speculation and adhere to the facts
- Provide any supporting information
- Summarise the discussion

## References

Francis R (2015) Freedom to Speak up: An independent review into creating an open and honest culture in the NHS. <http://freedomtospeakup.org.uk/the-report/>

Health and Care Professions Council (2019) Raising a concern – guidance for whistleblowers. HCPC

NHS (2016) Raising a Concern. <https://www.england.nhs.uk/ourwork/whistleblowing/raising-a-concern/>

Nursing and Midwifery Council (2018a) The Code: Professional standards of practice and behaviour for nurses, midwives and nursing associates. London NMC

Nursing and Midwifery Council (2018b) Raising Concerns: Guidance for nurses, midwives and nursing associates. London NMC

Nursing and Midwifery Council (2018c) Part 2: Standards for Student Supervision and Assessment. London NMC

Public Interest Disclosure Act 1998

## Appendix 1

