RAISING AND ESCALATING CONCERNS RELATING TO PRACTICE (HSC)

1. Introduction

The Health & Care Professions Council (HCPC) and the Nursing & Midwifery Council (NMC) both identify that registrants have a professional duty to put the interests of the people they care for first, to act in their best interests and to protect them if they are at risk (HCPC 2012, NMC 2008). From time to time you may experience or witness incidents in practice which cause you concern, and need you to act in a way that ensures you meet your professional responsibilities. This document provides guidance for students and staff to raise and report practice based concerns. This document reflects the recommendations from the Report of the Mid Staffordshire NHS Foundation Trust Public Inquiry (Francis 2013) and the resulting review of the NHS hospitals complaints system: Putting Patients Back in the Picture (Clwyd & Hart 2013).

2. Key Principles

2.1 The Clwyd & Hart report (2013) includes evidence from the Health Service Ombudsman (HSO 2013) and call for a cultural shift where:

- all feedback is welcomed;
- feedback is considered as part of a learning cycle to improve care;
- complainants can feel confident that their concern will be dealt with;
- the process will be open and transparent.

2.2 Raising concerns about issues in the workplace is different to making a personal complaint about how your employer treats you. You raise a “concern” when you are worried about an issue that affects the people you are caring for and you are acting to protect them. Employers normally have separate processes for employees to raise issues about their own treatment in the workplace. Raising concerns might include the following:

- Danger or risk to health and safety, such as where health and safety rules or guidelines have been broken.
- Issues to do with staff conduct, such as unprofessional attitudes or behaviour, including concerns related to equality and diversity.
- Issues to do with delivering care involving staff members (including safeguarding vulnerable people).
- Issues to do with care in general, such as concerns over resources, products, people, staffing or the organisation as a whole.
- Issues to do with the health of a colleague, which may affect their ability to practise safely.
- Misuse or unavailability of clinical equipment, including lack of adequate training.
Financial malpractice, including criminal acts and fraud.  
(NMC 2010:5)

3. How to raise a concern

All UEA staff and students have a responsibility to raise any concerns about service user safety and care, and to take appropriate action. It is recommended that you give your name when raising a concern however

Any concerns about safeguarding must be reported to the organisation involved in line with their safeguarding policy.

3.1 UEA process for students (see Appendix I)

You are advised in the first instance to discuss your concerns at the time of the incident with your mentor/practice educator or an appropriate senior member of staff in practice.

If you feel you are unable to discuss it with your mentor/practice educator or clinical lead then you can raise it with your link lecturer, visiting tutor or personal advisor.

The link lecturer, visiting tutor or personal advisor will then discuss it with practice organisation. If the concern remains it should be reported in writing to the Academic Lead (Practice Education) who will escalate it to senior management in the NHS Trust concerned and logged on the FMH database. The reporting form is attached to this policy (Appendix IV)

You will be informed about the plan of action between 2-3 days and of the final outcome when completed depending on the nature of the concern.

Whilst we understand that there may be times when you would prefer to keep your identity confidential, it must be understood that anonymity cannot be guaranteed for professional and legal reasons.

If you feel that the university has not adequately dealt with your concern about service user safety you may want to seek help from outside the university and this should be through a recognised organisation listed in Section 4.

3.2 UEA Process for staff (Appendix II)

3.2.1 Role of Link Lecturer (LL) / Visiting Tutor (VT)/ Personal Advisor (PA)

All staff have a duty to raise any concerns in practice either in their capacity as link lecturer, visiting tutor or Personal Advisor. In the first instance it is expected that any concerns will be raised in discussion with practice.

If the concern persists then a report (Appendix IV) and action plan should be initiated and submitted to the Academic Lead (Practice Education). If a student raises a concern with academic staff then the member of staff after clarifying the issue with the student must investigate the issue with practice before reporting the concern.
Link lecturers/ visiting tutors/ Personal Advisors are responsible to support students who raise concerns and to feedback to students the outcome of any concern raised or escalated.

3.2.2 Role of Academic Staff Marking Coursework

Sometimes academic staff might identify concerns through academic work submitted by students. In this case the Academic Lead (Assessment) should contact the student to clarify the concern.

If it is decided that there is a concern then it should be reported to the Academic Lead (Practice Education) and the process followed as above

3.2.3 Role of Academic Lead (Practice Education)

The Academic Lead (Practice Education) has overall responsibility for the raising and escalating concerns process (Appendix III) and is responsible for escalating concerns to the Education Lead and Director level in all NHS Trusts and to the appropriate senior manager in other organisations that provide practice education for students. Concerns will normally be escalated within 5 working days.

In the case of serious concerns the Academic Lead (Practice Education) is responsible for escalating concerns to monitoring bodies, and to report to Head of School any concerns that need to be escalated to regulatory and/or Health Education East of England. Depending on the seriousness of concern, it should be reported immediately or within 2 working days of reporting.

The Academic Lead (Practice Education) is responsible for maintaining a log of all concerns reported and producing a yearly report to the HEI and NHS Trusts and Organisations as part of the governance arrangements

4. Further advice and help:
NHS website

HCPC
http://www.hpc-uk.org/registrants/raisingconcerns/

NMC
http://www.hpc-uk.org/registrants/raisingconcerns/

Public Concerns at Work
http://www.pcau.org.uk/

Whistle blowing helpline
http://www.wbhelpline.org.uk/
References

Health and Care Professions Council (2012) Standards of Conduct, Performance and Ethics.

Health and Care Professions Council (2013) Raising and escalating concerns  
http://www.hpc-uk.org/registrants/raisingconcerns/


Nursing & Midwifery Council (2010) Raising concerns: Guidance for nurses and midwives


Approved July 2014
Due for review July 2016
APPENDIX I
RAISING CONCERNS PROCESS FOR UEA STUDENTS

At any point a student is able to raise/report concerns directly to the Academic Lead (Practice Education)

- Concerns about the learning environment
  - Discuss with your named mentor/practice educator
    - Issue resolved No Further Action
    - Issue unresolved/unable to discuss with mentor - discuss with LL/VT/PA
      - Issue unresolved report to Academic Lead (Practice Education) using HSC processes
        - PA/VT/LL to inform student of action taken
  - Issue unresolved/unable to discuss with mentor - discuss with LL/VT/PA

- Concerns about patient care
  - Discuss with named mentor/practice educator
    - Issue resolved No Further Action
    - Issue unresolved/unable to discuss with mentor - discuss with LL/VT/PA
      - Issue unresolved report to Academic Lead (Practice Education) using HSC Processes

Any concerns about safeguarding should be reported to the organisation in line with their Safeguarding Policy

- Issue resolved
- No Further Action
- Issue unresolved/LL/VT/PA to report to Academic Lead (Practice Education) using HSC Processes
  - student to be informed of the action taken
APPENDIX II
RAISING CONCERNS PROCESS FOR STAFF

Raising concerns in practice

Concerns about a placement area
Clarify/Investigate By LL/VT UEA & practice

Concerns about the learning environment

Concerns about patient safety
Clarify/Investigate By LL/VT UEA & practice

Concerns about a student
Investigate By LL/VT UEA

Issues resolved no further action
Concerns remain report to Academic Lead (Practice Education) using FORM (expected response 2-5 days escalated to PEP senior management)

Resolved – no further action
Concerns remain report to Academic Lead (Practice Education) using FORM (expected response 2-5 days escalated to PEP DoN)

Issues resolved – no further action
Concerns remain report to LTS using FORM (expected response 2-5 days)

Fitness to Practice Feedback (within 10 days of proceedings)
Appendix III
Raising and Escalating Concerns reporting Processes

1. Concern reported about practice
   - Consultation with others about level of concern
     - Manageable concern
       - Concerns logged and action plan developed in consultation with LL/VT and Academic Lead (Practice Education)
         - Action plan signed off by Academic Lead (Practice Education) when complete
           - Report collated into End of Year Report to Teaching Committee and NHS Trusts
     - Significant concern
       - Concern logged action plan initiated recording discussions and decision making trail
         - Concern escalated to Director of Nursing/ Director of Services/ Safeguarding Lead/ CQC
           - Concern persists to be escalated by Head of School to NMC/HCPC/HEEoE
             - Action plan to be signed off by Academic Lead (Practice Education)
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<tr>
<th>Type of Concern (please tick):</th>
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<tbody>
<tr>
<td>Learning Environment</td>
<td>Patient Care</td>
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School of Health Sciences

Raising and Escalating Concerns Form

(Please complete this form and return to the Academic Leads (Practice Education) c.lobo@uea.ac.uk / j.jepson@uea.ac.uk).

<table>
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<th>Student</th>
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<td>Practice Educator(s)/Mentor</td>
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| Visiting Tutor/Link Lecturer   |

| Practice Name/Number & Name of Organisation |

| Date of Incident/Concern (if appropriate) |

| Location of Incident/Concern |

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<thead>
<tr>
<th>If student is raising the concern</th>
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<tbody>
<tr>
<td>Is Your mentor/practice educator aware of this Incident/Concern (if not please state why)</td>
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<td>Is there any extra support requested from UEA? (if so please state)</td>
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<td>Summary of Incident/Concern</td>
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<th>Action Taken (including reporting this as per local protocols, seeking medical treatment, discussion in supervision, etc)</th>
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**Conclusion/sign off**

- [ ] Student notified of outcome
- [ ] Placement Provider informed/Head of Service informed
- [ ] Practice educator/s informed
- [ ] Course Director informed
☐ Head of School informed

☐ Advisor informed

☐ Visiting Tutor/Link Lecturer notified of outcome

☐ Logged on to the Faculty Health Sciences database

☐ Placement office informed

☐ No further action

Comment:

Signed:

Name:

Date: