Policy for raising practice-related concerns.

All staff and students within the Faculty of Health Sciences (FHS) have a professional responsibility to raise any concerns that they have in relation to practice learning environments. This policy provides details on the process to be followed when any such concerns are raised. The underlying principles are that concerns will be dealt with in collaboration with practice partners, that there will be effective and timely communication and information-sharing between stakeholders, and that those who raise concerns will be treated fairly and impartially.

This policy is based upon – and should be used in partnership with – professional body guidance on this issue:

NMC guidance on Raising Concerns, published in 2015: (http://www.nmc.org.uk/standards/guidance/raising-concerns-guidance-for-nurses-and-midwives/)

Health and Care Professions Council advice on raising and escalating concerns in the workplace: (http://www.hpc-uk.org/registrants/raisingconcerns/howto/).


Examples of situations which may require students or staff to raise concerns about a practice area may include:

- Suspected or witnessed instances of unsafe or poor practice
- Being asked to practise beyond their role, experience and training
- Danger or risk to health and safety
- Concerns related to equality and diversity
- Misuse or unavailability of clinical equipment
- Staffing levels perceived to be unsafe

The policy does not encompass:

- Concerns regarding the quality of the learning experience or environment (which should be discussed by students with relevant member of practice support staff (e.g. Practice Learning Facilitator or Clinical Skills Tutor), link lecturer or Academic Support Tutor).
- Allegations of bullying and/or harassment by staff members (which should be addressed to academic staff and then investigated jointly using the host organisation’s bullying and harassment guidance.

Student Responsibilities.

If a student has a concern about the safety of people in their care (either that they have received information about or that they have witnessed) they need to raise their concerns through the mechanisms outlined in this policy.
To raise a concern, students do not need to wait for, or have, all the facts available to prove any allegations. However, they must have a reasonable belief or suspicion that wrongdoing is either happening now, took place in the past, or is likely to happen in the future.

It is important that when any such concerns are reported, they are documented clearly and concisely. To facilitate this, students should follow the guidelines for writing statements available from organisations such as the Royal College of Nursing (https://www.rcn.org.uk/get-help/rcn-advice/statements) or Royal College of Midwives (https://www.rcm.org.uk/workplace-support/individual-representation/statement). The key points to include in any statement written are the context of the concerns, relevant names, dates and places, and the main issues to be investigated and addressed.

The processes for raising practice concerns are summarised on page 4. In most cases, raising of concerns will commence at ‘stage one’. The roles and responsibilities of each stage of escalation are:

**Stage One.**

1. Student raises concern with mentor or placement area manager
2. Discussion takes place between mentor/manager and student, and satisfactory resolution is identified
3. Student and mentor/placement manager document concerns and action taken on the FHS ‘Raising Practice Concerns’ tracking form available from programme/intake eBridge site or PLU website
4. Completed form is labelled as ‘confidential’ and sent to the Faculty Quality Office (fhs-quality@hull.ac.uk)
5. Quality office sends copy of form to relevant practice support staff member (e.g. Practice Learning Facilitator/Clinical skills tutor), link lecturer and student’s Academic Support Tutor (AST) for information
6. Quality coordinator checks concern against archive of previous cases to ensure that there is no evidence of any patterns of worrying activity (e.g. numerous concerns raised in one specific clinical area). Any such patterns would be reported to the Associate Dean for Learning, Teaching and Quality, who would discuss with the agreed point of contact in the clinical setting.

**Stage Two.**

*If the student feels unable to follow the activities described in Stage One or is dissatisfied with the resolution, they should:

1. Raise their concern with Practice Support staff or University link lecturer/Academic Support Tutor (AST)
2. Tripartite discussion takes place between practice support staff, link lecturer/AST and student, and satisfactory resolution is identified
3. Student and link lecturer/AST document concerns and action taken on the FHSC ‘Raising Practice Concerns’ tracking form available from programme/intake eBridge site or PLU website
4. Completed form is labelled as ‘confidential’ and sent to the Faculty Quality Office (fhs-quality@hull.ac.uk)
5. Quality office send copy of form to relevant practice support staff (e.g. Practice Learning Facilitator/Clinical skills tutor) and programme/intake lead for information
6. Quality coordinator checks concern against archive of previous cases to ensure that there is no evidence of any patterns of worrying activity (e.g. numerous concerns raised in one specific clinical area). Any such patterns would be reported to the Associate Dean for Learning, Teaching and Quality, who would discuss with clinical colleagues.

**Stage Three.**
*If the student feels that the concern has not been addressed adequately in either stage one or two, or that there is an immediate risk to service users, they should:*

1. Raise their concern directly with one of the following (depending on programme and availability): Intake Lead; Programme Lead; Field Lead; Lead Midwife for Education; Director of Practice Learning or Director of Pre-Registration Nurse Education.
2. Member of academic staff contacts practice placement representative to explore the issues raised and agree on responsibility, key personnel and timescales for joint investigation (e.g. identifying which partner will lead on investigation)
3. Following investigation, satisfactory outcome is identified through tripartite discussion between practice partner, academic staff and student.
4. Student and relevant academic member of staff document concerns and action taken on the FHSC ‘Raising Practice Concerns’ tracking form available from programme/intake eBridge site or PLU website
5. Completed form is labelled as ‘confidential’ and sent to the Faculty Quality Office (fhs-quality@hull.ac.uk)
6. Quality office send copy of form to relevant practice support staff for information and any necessary follow-up action. Copy is also sent to intake/programme lead for information
7. Practice partners provide summary of any actions taken and report this to Faculty Quality Office (via fhs-quality@hull.ac.uk) to complete feedback loop.

**Stage Four.**
*If the student feels that their concern has not been adequately addressed at any of the preceding stages, they should:*

1. Contact their professional body (e.g. NMC or HCPC), the CQC or the NHS Whistleblowing helpline. Healthcare students may also wish to contact Health Education Yorkshire and Humberside (contactus@yh.hee.nhs.uk)
2. Inform the Faculty Quality Office by completing and sending ‘Raising Practice Concerns’ tracking form to fhs-quality@hull.ac.uk

Irrespective of the stage of activity activated in escalating the concern, it is important for both the Faculty and practice partners to keep confidential records of any incidents including dates and times of any events, the names of witnesses and any attempts that have been made to resolve the issues. These will be held by the Faculty Quality Office.

In addition to the processes outlined above, practice partners may wish for any concerns to be logged using organisation-specific critical incident reporting mechanisms (e.g. Datix). Students and faculty staff will be guided on the necessity of this by practice area staff.
Faculty of Health Sciences

‘Raising Practice-related concerns’ Flowchart

‘I have a concern about the safety or wellbeing of people in my care or in the environment in which I or my students work.’

If there is an immediate risk of harm, report your concerns immediately to the appropriate person or authority (Start at stage three)

Stage One

Raise your concern with your mentor or the manager of the clinical area

The concern will then be addressed formally by the mentor/manager

You and mentor complete the UoH ‘Raising Practice Concerns’ Tracking form and send to the FHSC Quality Co-ordinator (fhsc-quality@hull.ac.uk)*

If outcome is not satisfactory, go to Stage Two

Stage Two

Start here if you feel unable to raise concerns with your mentor or manager of the clinical area or if you feel your concern has not been dealt with properly in stage one

Raise your concern with the Practice Support Staff, University Link Lecturer or Academic Support Tutor (AST)

The concern will then be addressed formally by the Practice Support Staff and University Link Lecturer

You and link lecturer complete the UoH ‘Raising Practice Concerns’ Tracking form and send to the FHSC Quality Co-ordinator (fhsc-quality@hull.ac.uk)*

If outcome is not satisfactory, go to Stage Three

Stage Three

Start here if there is an immediate risk to others or if you feel your concern has not been addressed properly in stages one or two

Raise your concern with a senior academic member of staff**

The concern will then be addressed formally by the member of academic staff in collaboration with you and practice partners

You and member of academic staff complete the UoH ‘Raising Practice Concerns’ Tracking form and send to the FHSC Quality Co-ordinator (fhsc-quality@hull.ac.uk)*

If the situation is not resolved satisfactorily, go to Stage Four

Stage Four

Start here If you feel unable to raise a concern at any level within practice or the University or if you feel your concern has not been addressed properly in previous stages

Escalate your concern to your professional body (e.g. NMC or HCPC), Health Education England (HEE) for Yorkshire and Humberside or the NHS Whistleblowing Service

Inform the Faculty Quality Office of this action by completing the UoH ‘Raising Practice Concerns’ form and sending to FHSC Quality Co-ordinator (fhsc-quality@hull.ac.uk)

* Depending on local placement policy, it may also be necessary to complete a Trust/organisation clinical incident form (e.g. Datix). Advice on this will be provided by your mentor or practice support staff

** Depending on programme and availability, this could be your Intake Lead; Programme Lead; Field Lead; Lead Midwife for Education; Director of Practice Learning or Director of Pre-Registration Nurse Education.
FHS Staff Responsibilities.

In the first instance, once a concern has been raised, staff should establish if there is an immediate risk to service users or the student. Dependent on the level of severity, it may be possible to resolve the situation as outlined in the guidance above. Regardless of outcome, all information about the concern and FHSC staff involvement should be forwarded to the Faculty Quality Office using the ‘Raising Practice Concerns’ tracking form.

Removing students from practice areas

Dependent on the perceived level of risk, all students may need to be removed immediately from a placement area. This decision should be made in collaboration with the partnership organisation concerned and following discussion between the member of staff dealing with the student’s concerns, the Director of Practice Learning and the Associate Dean for Education. If students are required to be removed from a practice area, the following immediate actions should be taken by the Director for Practice Learning:

- Students should be informed of their removal from the area and if possible given details of reallocation.
- Where relevant, other areas of the University using the placement area for students should be informed of the decision e.g. Hull & York Medical School
- Relevant Practice Support Staff (e.g. PLF; Link Lecturers) should be informed of the decision and asked to remove the area from the placement circuit.
- An appropriate senior lead manager (e.g. the Professional Development lead; Chief Executive; Local Authority safeguarding team) for the practice organisation involved should be informed of the decision.
- Where there is a shared placement circuit other HEIs should also be informed.
- Relevant regulatory bodies (e.g. NMC; HPC; CQC) should be informed by the Faculty Quality Office, in collaboration with the practice organisation.

Concerns raised indirectly in student assignments

- All areas of concerns relating to clinical practice, or patient safety reported within a student assignment or any other theoretical piece of work should be reported by the marker to the relevant module leader as soon as possible after identification.
- The informed member of faculty staff will then instigate a timely meeting with the student to discuss the incident.
- If at this meeting, matters raised are found to be unsubstantiated, the student will be advised on how to ensure that their work does not raise any unnecessary concerns in the future.
- If the meeting with the student suggests any deliberate attempt to deceive or maliciously raise false concerns, this may require escalation though student disciplinary/misconduct processes.
- If the meeting suggests that the concerns raised in the student’s work are valid, then the academic and student should jointly proceed with the raising concerns process as outlined above.
### Raising Practice Concerns Tracking Form

This form is to be used in all cases where staff or students have concerns about the safety or well-being of people in their care, or the environment in which students are placed.

<table>
<thead>
<tr>
<th>Student Surname</th>
<th>University Registration Number (if known)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Programme of Study</td>
</tr>
<tr>
<td></td>
<td>Year</td>
</tr>
<tr>
<td></td>
<td>Semester</td>
</tr>
</tbody>
</table>

**Name of Trust / Placement provider:**

**Name of placement (ward/department/service):**

**Brief description of concerns:**

**Brief description of action taken:**

**Person completing form:**

**Name (please print):**................................. **Signature**.................................

**Designation**

<table>
<thead>
<tr>
<th>Date</th>
<th>Contact no Tel</th>
<th>Email</th>
</tr>
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**Please return to:**

<table>
<thead>
<tr>
<th>Quality Office</th>
<th>Received by name:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Faculty of Health Sciences</td>
<td>Date:</td>
</tr>
<tr>
<td>University of Hull</td>
<td>Copy to file by name:</td>
</tr>
</tbody>
</table>

Scanned copies to fhs-quality@hull.ac.uk

Received by name: **Date:**

Copy to file by name: **Date:**