

**Faculty of Health Sciences (Nursing (including apprenticeships and Specialist Community Nursing, Trainee Nursing Associates, ODP, Midwifery, Paramedics, Physiotherapists) Policy for raising concerns about the safety or wellbeing of people in health and social care placements.**

### **Background**

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 the safety or wellbeing of people in health and social care placements. The faculty recognises that raising concerns can sometimes require courage to report unsafe practices in patient care and will support those who have taken this step. 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 on and should be used alongside Professional, Statutory, and Regulatory Body (PSRB) guidance:

- Nursing and Midwifery Council (NMC) Raising concerns: Guidance for nurses, midwives and nursing associates: <http://www.nmc.org.uk/standards/guidance/raising-concerns-guidance-for-nurses-and-midwives/>
- Health and Care Professions Council (HCPC) How to raise concerns: <https://www.hcpc-uk.org/globalassets/resources/guidance/how-to-raise-a-concern.pdf>

**Definition of a Placement Supervisor:** this refers to all trainers/supervisors/coordinators/mentors/educators/assessors who are appropriately qualified/suitably prepared to support learners. In the practice placement, learners are provided with a named member of staff who will oversee their learning on placement and is usually responsible for the assessment of the learner's practice. The title of this person varies according to each profession and as such we have used a generic term of placement supervisor.

Examples of situations which may require students or staff to raise concerns about the safety or wellbeing of people in health and social care placements include:

- Suspected or witnessed instances of unsafe or poor practice
- Reports of unsafe or poor practice in written work
- Students being asked to practise beyond their role, experience and training
- Danger or risk to people's health and safety
- Breaches of patient confidentiality
- Concerns related to equality and diversity
- Misuse or unavailability of clinical equipment
- Staffing levels perceived to be unsafe

**This policy does not encompass:**

- Concerns regarding a student experiencing difficulty in achieving practice assessments which should be dealt with under the *Processes for Escalating Concerns Regarding Students on Practice Placement*.
- Concerns regarding the quality of the learning experience or environment which should be dealt with under the *Guidance for students escalating/reporting concerns about the quality of learning environments*.
- Allegations of bullying and/or harassment by staff members which should be addressed following the *Guidance for actions in the event of bullying while on placement* and the host organisation's bullying and harassment guidance.

The *Processes for Escalating Concerns Regarding Students on Practice Placement* and *Guidance for actions in the event of bullying while on placement* and *Guidance for students escalating/reporting concerns about the quality of learning environments* documents can be accessed on the University of Hull's Placement Learning Unit website.

**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.

Where students are also employees, for example apprentices or students on post-qualifying programmes, they are expected to know and follow their employing trust/organisation's policies and procedures in addition to the processes 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 unsafe or poor practice 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 and Royal College of Midwives and the placement should support students with writing a 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 correct form for reporting a Raising Practice Concern is included in this document as **Appendix 1** (page 9-10). This form is also available on the University of Hull Placement Learning Unit webpage.

The processes for raising practice concerns are summarised on **page 6**. 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 placement supervisor or placement manager.
2. Discussion takes place between placement supervisor/placement manager and student, and satisfactory resolution is identified.
3. Student and placement supervisor/placement manager document concerns and action taken on the FHS 'Raising Practice Concerns' tracking form available on the University of Hull Placement Learning Unit website.
4. Completed form is labelled as 'confidential' and sent to the Faculty Quality Office ([fhs-quality@hull.ac.uk](mailto:fhs-quality@hull.ac.uk)).
5. Quality office sends copy of form to relevant practice support staff member (i.e. Practice Learning Facilitator/Clinical skills tutor/Practice Education Facilitator), link lecturer, Faculty Lead for Placement Learning and/or the Professional Lead for the relevant programme and the relevant programme director.
6. Quality office 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 Education, 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/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 FHS 'Raising Practice Concerns' tracking form available on the University of Hull Placement Learning Unit website.
4. Completed form is labelled as 'confidential' and sent to the Faculty Quality Office ([fhs-quality@hull.ac.uk](mailto:fhs-quality@hull.ac.uk)).
5. Quality office send copy of form to relevant practice support staff (i.e. Practice Learning Facilitator/Clinical skills tutor/Practice Education Facilitator), link lecturer, Academic Lead for Placement learning and/or Professional Lead for the relevant programme and the relevant programme director for information.
6. Quality office 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 Education, 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): Programme director, Professional Lead.
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 by placement provider, 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 FHS 'Raising Practice Concerns' tracking form available on the University of Hull Placement Learning Unit website.
5. Completed form is labelled as 'confidential' and sent to the Faculty Quality Office ([fhs-quality@hull.ac.uk](mailto: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 programme director for information.
7. Practice partners provide summary of any actions taken and report this to Faculty Quality Office (via [fhs-quality@hull.ac.uk](mailto:fhs-quality@hull.ac.uk)) to complete feedback loop.

#### **Stage Four**

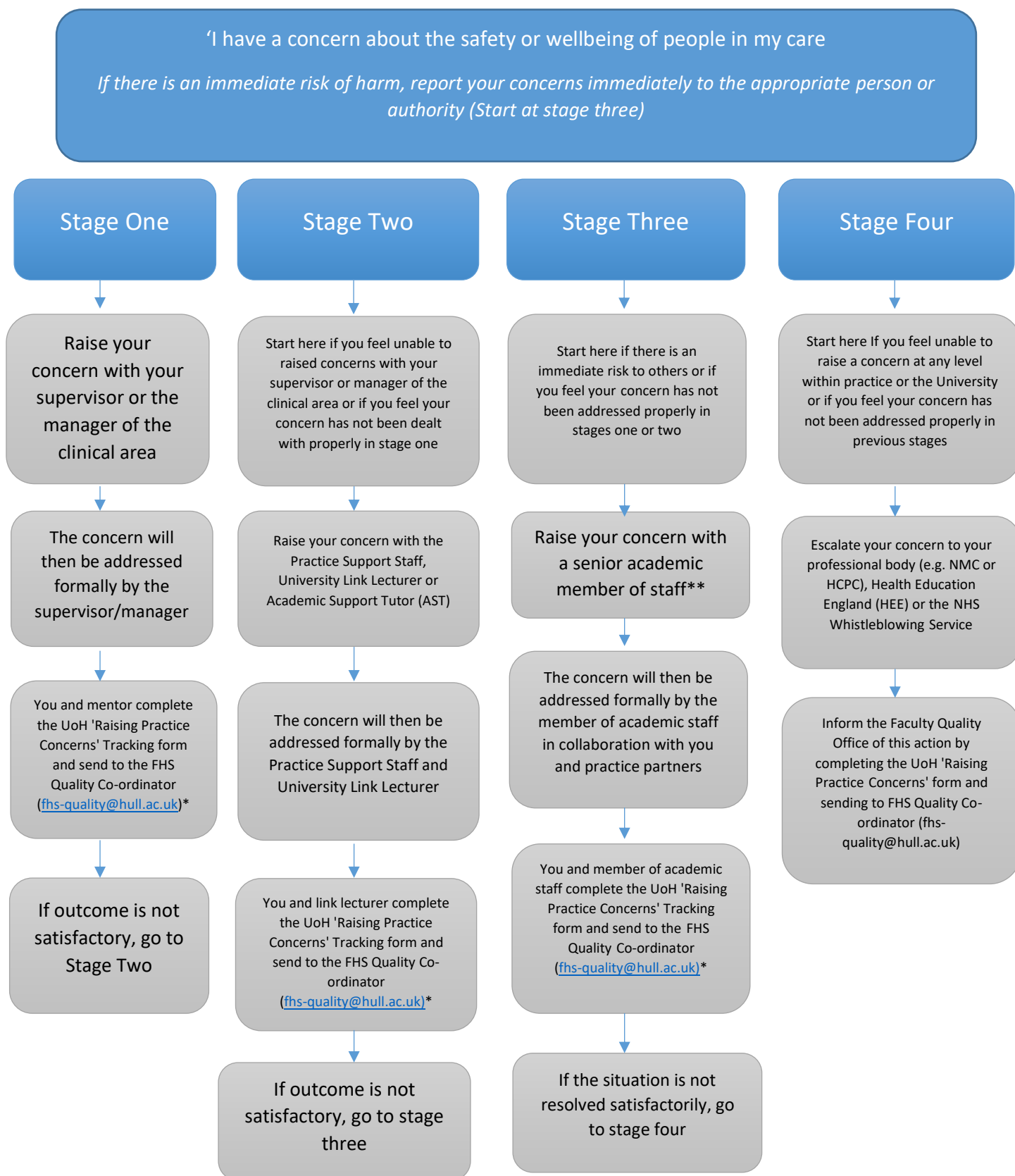
*If the student feels that their concern has not been adequately addressed at any of the preceding stages, they should:*

1. Contact their professional body (e.g. NMC or HCPC), the Care Quality Commission or the NHS Whistleblowing helpline. Healthcare students may also wish to contact Health Education England (North).
2. Inform the Faculty Quality Office by completing and sending 'Raising Practice Concerns' tracking form to [fhs-quality@hull.ac.uk](mailto: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.

## Raising Practice-related Concerns Flowchart



\*Depending on local placement policy, it may also be necessary to complete a trust/organisation clinical incident form. Advice on this will be provided by practice staff

\*\*Depending on programme and availability, this could be your programme director, Lead midwife for education or Academic Lead for Nursing programmes

## **FHS Staff Responsibilities**

In the first instance, once a concern has been raised, staff should establish if there is an immediate risk to patients and clients 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 FHS staff involvement should be forwarded to the Faculty Quality Office using the 'Raising Practice Concerns' tracking form.

## **Practice Partner Responsibilities**

All practice staff involved in the supervision and assessment of healthcare students have a duty under their relevant professional regulatory body to act and escalate concerns about the safety or wellbeing of people in health and social care placements. As such, practice staff must support students to raise and report concerns and assist in any investigation. Practice staff are also expected to report any concerns they have using their own trust/organisation procedures and policies and report the concern using the processes outlined in this document.

## **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 Professional Lead and/or the Academic Lead for placement 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:

- 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/CST/PEF; 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. According to the generic marking grid/tool unsafe practice is awarded a mark of zero.
- If the meeting with the student suggests any deliberate attempt to deceive or maliciously raise false concerns, then this will follow the University regulations on the investigation and determination if professional misconduct/suitability 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.

## Glossary

Practice Learning Facilitator	PLF
Clinical Skills Tutor	CST
Practice Education Facilitator	PEF
Link lecturer/academic link	a member of the academic team who supports practice
Academic Support Tutor	AST





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Brief description of action taken
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Person completing form: Name (please print):..... Signature..... Designation Date                      Contact no Tel:                      Email:
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<b>Please return to:</b> Quality Office Faculty of Health Sciences University of Hull Scanned copies to <a href="mailto:fhs-quality@hull.ac.uk">fhs-quality@hull.ac.uk</a>
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Received by name: Date:  Copy to file by name: Date:
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