
Freedom to Speak Up: Raising Concerns Policy

Solent NHS Trust policies can only be considered to be valid and up-to-date if viewed on the intranet. Please visit the intranet for the latest version.

Purpose of Agreement	This policy guides employees on the actions to take if they have a genuinely held concern about actual or prospective improper actions of a colleague or process which puts a service or patient safety at risk.
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Review Log:

Version Number	Review Date	Name of reviewer	Ratification Process	Reason for amendments
1	01/10/12	SM	NHSLA, JCC	Legislative changes
2	01/11/16	SM	JCC, PSG	Policy rewrite to incorporate Freedom to Speak up and Duty of Candour
3	1/12/19	Sarah Osborne	Freedom to Speak Up Guardians, Policy Steering Group, Trust Management Team meeting	Review of policy following changes to guidance and personnel

Amendments Summary:

Amend No	Issued	Page	Subject	Action Date
1	Feb 2020	3	Summary extended to include contacts and speaking to manager	Mar 20
2	Feb 2020	5	Introduction now includes HEART values and team of guardians	Mar 20
3	Feb 2020	5	New SCOPE wording, Definitions updated to reflect National definitions	Mar 20
4	Feb 2020	6	Process includes changes in wording and updated titles	Mar 20
5	Feb 2020		3.9 includes anonymous incident reporting	Mar 20
6	Feb 2020		3.20 Clarity on recording of cases	Mar 20
7	Feb 2020		3.21 clarity on investigations	Mar 20
8	Feb 2020	10	Addition of update training for Guardians and induction session	Mar 20
9	Feb 2020	10	Cases are reviewed by Speak up Team, not HR	Mar 20
10	Feb 2020	11	Policies list updated	Mar 20
11	Feb 2020	12/13	Appendices 1 and 2 processes updated	Mar 20
12	Feb 2020	14/15	Appendices 3 and 4 contacts updated	Mar 20
13	Feb 2020	18	Appendix 6 New Equality impact assessment	Mar 20

SUMMARY OF POLICY

This policy integrates the National Policy on Freedom to Speak Up following the Sir Robert Francis review into whistleblowing in the NHS. All NHS Organisations in England are expected to implement this minimum standard in order to help normalise raising of concerns for the benefit of all patients and employees.

This policy explains to employees the Trust position on speaking up about concerns and references the differences between a variety of policies which can be used to raise different types of concerns.

It explains the Freedom to Speak Up Guardian role, and the named contacts both internal and external to the Trust.

If an employee feels they need to speak up, they should consider speaking to their line manager and/or their service manager in the first instance. If this does not give them the answers they want, or they do not feel able to do this, then the Freedom to Speak Up Guardian team can be contacted for support and guidance using the generic contact details:

Telephone: 02381030100

E-mail: freedomtospeakup@solent.nhs.uk

Freedom to Speak Up: Raising Concerns Policy

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Freedom to Speak Up: Raising Concerns Policy

1. INTRODUCTION AND PURPOSE

- 1.1 The Trust acknowledges that speaking up about any concerns employees have at work is really important and helps the Trust to improve the services it provides and the working environment for employees
- 1.2 The Trust understands that individuals may feel worried about speaking up, but is committed to an open and honest culture, and wants everyone to feel able to speak up when needed, in line with the Trust HEART values and aspiration to be a “great place to work”.
- 1.3 The Trust will look into what individuals say, and employees will have access to the support that they need, including knowing how to raise concerns in the right way
- 1.4 The Trust has appointed a team of Guardians, with a designated Lead Guardian. The team, although employed by the Trust act independently whilst in their Guardian role

2. SCOPE

- 2.1 This policy applies to locum, permanent, and fixed term contract employees (including apprentices) who hold a contract of employment or engagement with the Trust, and secondees (including students), volunteers (including Associate Hospital Managers), bank staff, Non-Executive Directors and those undertaking research working within Solent NHS Trust, in line with Solent NHS Trust’s Equality, Diversity and Human Rights Policy. It also applies to external contractors, agency workers, and other workers who are assigned to Solent NHS Trust
- 2.2 Solent NHS Trust is committed to the principles of Equality and Diversity and will strive to eliminate unlawful discrimination in all its forms. We will strive towards demonstrating fairness and Equal Opportunities for users of services, carers, the wider community and our employees
- 2.3 Definitions:
 - 2.3..1 Speaking up:- The National Guardians’ office (www.nationalguardian.org.uk) states “Workers can speak up about anything that gets in the way of high-quality effective care, or that affects their working life. It is something that should happen as ‘business as usual’. Speaking up may take many forms including a quick discussion with a line manager, a suggestion for improvement submitted as part of an employee suggestion scheme, raising an issue with a Freedom to Speak Up Guardian, or bringing a matter to the attention of a regulator
 - 2.3..2 Whistleblowing:- Some people may interpret all or some of the above actions as ‘whistleblowing’, others may only associate ‘whistleblowing’ with something that is ‘formal’, or a matter that is escalated outside an organisation, or to describe something that may qualify for ‘protection’ under the Public Interest Disclosure Act. The Trust preferred term is “Speaking Up”

3. PROCESS REQUIREMENTS

What can employees speak up about?

- 3.1 For process flowcharts, please see Appendices 1 and 2
- 3.2 Under this policy if any member of employees has a concern about risk, malpractice, or wrongdoing which they believe is harming a service the Trust commissions or delivers they are able to speak up. This will be treated confidentially. A concern might include but is not restricted to :
- Unsafe patient care
 - Unsafe patient practice
 - Unsafe working conditions
 - Malpractice and Professional Misconduct
 - Inadequate induction or training of employees
 - Lack of, or poor response to a reported patient safety incident
 - Suspicions of fraud A bullying culture across a team, Service, or the Trust.
- 3.3 All employees should remember that they do not need to wait for proof to speak up, as the Trust would like the matter raised whilst it is still a concern. If in doubt, please speak up.
- 3.4 If an concern raised to the Freedom to Speak up Guardian is not thought to be a speaking up issue, the employee member will be directed to the appropriate Policy or support

Feel safe to raise a concern

- 3.5 If an employee raises a genuine concern under this policy they will not be at risk of losing their job or suffering any form of reprisal as a result. Provided the employee is acting honestly, it does not matter if they are mistaken or if there is an innocent explanation for the concerns.
- 3.6 The Trust will not tolerate the harassment or victimisation of anyone raising a concern. Nor will it tolerate any attempt to bully the employee into not raising any such concern. Any such behaviour is a breach of the Trust values and, if upheld following investigation, could result in disciplinary action.

Confidentiality

- 3.7 We hope that employees will feel comfortable raising a concern openly, but the Trust appreciates that employees may want to raise it confidentially. This means that if the employee is willing for their identity to be known to the Guardian the concern is reported to, but they do not want anyone else to know their identity, this will be honoured. The Trust will keep the employees identity confidential, if that is what the employee wants, unless they are required to disclose it by law (for example, to the police). An employee can choose to raise a concern anonymously, by writing to Freedom to Speak Up at trust headquarters, without giving anyone their names, but that may make it more difficult for the Trust to investigate thoroughly and give feedback on the outcome.
- 3.8 If an employee wishes to raise an incident anonymously, they can do so by using the “report anonymously if whistleblowing” button on the incident reporting form. The incident is then considered by the Quality and Risk team and only the appropriate person(s) will see it. The reporter’s identity may not be shared depending on the incident and taking their wishes into consideration

Who can speak up?

- 3.9 Anyone who works (or has worked) in the NHS, or for an independent organisation that provides NHS services can raise concerns. This includes those specified in the scope above

Who should a concern be raised with?

- 3.10 In many circumstances the easiest way to get a concern resolved will be to raise it formally or informally with the employee's line manager (or lead clinician or tutor), but where the employee doesn't think it is appropriate to do this, they can use any of the options set out below in the first instance.

- 3.11 If raising it with the line manager (or lead clinician or tutor) does not resolve matters, or the employee does not feel able to raise it with them, they can contact one of the following people:

- The Trust Freedom to Speak Up Guardian - this is an important role identified in the Freedom to Speak Up review to act as an independent and impartial source of advice to employee at any stage of raising a concern, with access to anyone in the organisation, including the chief executive, or if necessary, outside the organisation
- The Trust Quality and Safety team

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

- The Executive director with responsibility for whistleblowing
- The non-executive director with responsibility for whistleblowing
- The professional lead for the employees' profession e.g. Chief Nurse, Chief Medical Director

Full contact details are included at appendix 3

- 3.12 All these people have been trained in receiving concerns and will give employee's information about where they can go for more support

- 3.13 If for any reason employee do not feel comfortable raising the concern internally, they can raise concerns with external bodies, see Appendix 4, but we would encourage employee to use the Trust Speaking Up processes wherever possible

Advice and Support

- 3.14 The following local support is available to employee from:

- Their line manager
- Senior Managers
- People Services
- The Employee Assistance programme Workplace Options

- 3.15 However, an employee can also contact the Whistleblowing Helpline for the NHS and Social care, their professional body or trade union representative

How can employees speak up?

- 3.16 A concern can be raised by phone, in writing or by email to the line manager, managers manager or any of the individuals named in paragraph 3.12

3.17 Whichever route is chosen, the employee must be ready to explain as fully as they can the information and circumstances that give rise to the concern in confidence

What will happen after someone has spoken up?

3.18 The Trust is committed to the principles of the Freedom to Speak Up review and its vision for raising concerns, and will respond in line with them (see Appendix 2).

3.19 The Trust is committed to listening to its' employees, learning lessons and improving patient care. On Speaking Up, the concern will be recorded on the Freedom to Speak Up confidential, secure database as per the personal agreement made with the employee member.

3.20 The central record will record the date the concern was received, whether the employee has requested confidentiality, a summary of the concerns and dates when updates or feedback have been given.

Assessment/review

3.21 If appropriate, the Trust will commence an Investigation into the concern. Once received, the concern will be assessed and a plan made for actions to be taken. Wherever possible the Trust will carry out a single investigation (so, for example, where a concern is raised about a patient safety incident, it will usually undertake a single investigation that looks at the concern and the wider circumstances of the incident). If the concern suggests a serious incident, an investigation will be carried out in accordance with the Serious Incident framework. 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. Wherever appropriate the report will be shared with the person raising the initial concern, or they will be informed or the reason the full report cannot be shared

3.22 The person with whom the employee has raised their concern, after discussion with the employee, may decide that the concern would be better looked at under another process; for example, the Trust process for dealing with bullying and harassment. If so, this will be discussed with the individual. Any employment issues (that affect only the employee and not others) identified during the investigation will be considered separately.

Communicating with the employee

3.23 The Trust will treat the employee with respect at all times and will thank them for raising their concerns. They will discuss the concerns with the employee to ensure they understand exactly what the employee is worried about. The Trust will tell the employee how long they expect the investigation to take and keep them up to date with its progress. Wherever possible, the Trust will share the full investigation report with the employee (while respecting the confidentiality of others). The investigator will not be a Freedom to Speak Up Guardian.

How will the Trust learn from the concern?

3.24 The focus of the investigation will be on improving the service the Trust provides for patients. Where it identifies improvements that can be made, the Trust 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. The board supports employees raising concerns and wants them to feel free to speak up.

3.25 The Freedom to Speak up Lead will write an annual report of all concerns raised and report quarterly to the National office. These reports will maintain the confidentiality of those speaking up

3.26 The Freedom to Speak Up team will report and escalate any concerns through the governance and assurance process within the trust

Raising a concern with an outside body

- 3.27 Alternatively, you can raise your concern outside the organisation with
- Care Quality Commission for quality and safety concerns
 - NHS England or NHS Improvement for performance and delivery of NHS Trusts, primary Care and Dental Services
 - Health Education England for education and training in the NHS
 - NHS Counter Fraud Authority for concerns about fraud and corruption
 - The relevant regulatory body e.g. General medical Council, Nursing and Midwifery Council, Healthcare Professionals Council, General Dental Council etc

Contact details are enclosed at appendix 4

Making a “protected disclosure”

- 3.28 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 name in paragraph 3.27, 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 for the NHS and social care, Public Concern at Work, or a legal representative.

National Guardian Freedom to Speak up

- 3.29 The Freedom to Speak Up National Guardian can independently review how employees have been treated having raised concerns where NHS trusts and foundation trusts may have failed to follow good practice, working with some of the bodies listed above to take action where needed.

4. ROLES AND RESPONSIBILITIES

Employees

- 4.1 Employees are responsible for the following under this policy:
- Accepting professional accountability and maintaining the standards of professional practice as set by the appropriate regulatory body
 - Taking reasonable care of health and safety at work for themselves, team, patients and other
 - Act in accordance with the express and implied terms of their contract
 - Not discriminating against patients or employees and to adhere to equal opportunities and equality and human rights legislation
 - Protecting the confidentiality of personal information
 - Being honest and truthful
 - Reporting all incidents and concerns
 - Cooperating with any investigations conducted under this policy
- 4.2 Please remember that all health care professionals have a duty to report any concerns they may have about patient care or safety.

Managers

- 4.3 Managers are responsible for the following under this policy:
- Encouraging employees to raise concerns at the earliest opportunity,
 - Being approachable
 - Taking any complaints/concerns made by employees seriously
 - Responding to any complaints/concerns positively within the prescribed timescales
 - Maintaining confidentiality
 - Ensure that there is a fair process for investigation
 - Maintaining good communication with the employee who raised the concern

- Acting consistently and fairly
- Providing support to employees
- Keeping clear and concise records of the dates and time of action taken

Freedom to Speak up Guardian

4.4 The Freedom to Speak up Guardian is responsible for:

- Being an expert in all aspects of raising and handling concerns
- Offering support and advice to employee who wish to raise a concern or are handling concerns
- Ensuring feedback is given to the employee member raising a concern
- Watch over any concerns that have been raised
- Safeguarding the interests of the individual raising a concern
- Identifying common themes
- Taking an objective view
- Ensuring concerns are escalated as appropriate
- Reporting to the board and externally(Lead Guardian)
- Completing such reports as required

The Trust Board

4.5 The Trust Board (via the Freedom to Speak up Steering group) are responsible for the following under this policy:

- Receiving the annual report on Speaking up complaints
- Ensuring that recommended actions following investigations are prioritised and actioned
- Provides an organisational culture where employees are encouraged to raise concerns and are supported when they do.

5. TRAINING

5.1 The Freedom to Speak Up Guardians will receive specialist training and support via the National Guardians Office, the local network and the other Freedom to Speak Up Guardians within the Trust, including update training

5.2 Employees will undertake Freedom to Speak Up training via e-learning and presentations from the Freedom to Speak Up Guardians, including a short introductory session at Trust Induction

6. EQUALITY IMPACT ASSESSMENT AND MENTAL CAPACITY

6.1 The Trust is committed to treating people fairly and equitably regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. An equality impact assessment has been carried out for this policy, which is attached at Appendix 5 and no significant issues have been identified.

6.2 This policy has also been assessed and meets the requirements of the Mental capacity Act 2005.

7. SUCCESS CRITERIA/MONITORING EFFECTIVENESS

7.1 The success and effectiveness of the policy will be monitored annually as follows:

- Cases will be reviewed by the Freedom to Speak up team and themes identified, both in the type of event being spoken up about and the areas/services involved
- The board will be given high level information about all concerns raised by Trust employees through this policy and what it is doing to address any problems.
- The Trust will include similar high level information in its annual report.

8. REVIEW

- 8.1 Although this document may be reviewed at any time at the request of either at employee side or management, it will be checked each year to ensure that the contact numbers for prescribed organisations and individuals are up-to-date, and that the processes are still valid.
- 8.2 It will automatically be reviewed 3 years from initial approval and thereafter on a triennial basis unless organisational changes, legislation, guidance or non-compliance prompt an earlier review.

9. REFERENCE AND LINKS TO OTHER DOCUMENTS

9.1 This policy links to the following policies:

- Resolution Policy
- Concerns, enquiries and compliments policy
- Improving and managing conduct policy
- Investigation Policy
- Dignity at Work Policy
- Equality Diversity and Human Rights policy
- Duty of Candour Policy
- Local Counter Fraud, Bribery and Corruption Policy
- Health and Safety Policy
- Reporting of Adverse Events Policy
- Physical Security Management Policy
- Serious Incidents Requiring Investigation Policy
- Managing Performance of Medical and Dental Staff
- Safeguarding Children Young people and Adults Policy
- Equality, Diversity, Inclusion and Human Rights Policy
- Performance Management Policy

PROCESS FOR RAISING AND ESCALATING A CONCERN

STEP ONE

If you have a concern about a risk, malpractice or wrongdoing at work, we hope you will feel able to raise it first with your line manager, lead clinical or tutor (for students). This may be done orally or in writing.

STEP TWO

If you feel unable to raise the matter with your line manager, lead clinician or tutor, for whatever reason, please raise the matter with our Freedom to Speak Up Guardian team:

TELEPHONE: 02381030100

E-MAIL: FREEDOMTOSPEAKUP@SOLENT.NHS.UK

POSTAL ADDRESS: FREEDOM TO SPEAK UP, SOLENT NHS TRUST, HIGHPOINT VENUE, SOUTHAMPTON, SO19 8BN

The guardians have been given special responsibility and training in dealing with 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, as 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 the Chief Executive, Chief Medical Officer, Chief Nurse or nominated Non-Executive Director as per list in appendix 3

STEP FOUR

You can raise concerns formally with external bodies as listed in appendix 4.

Process for Raising Concerns in Solent

You have a concern that you want to raise

Follow internal procedures/policies

OR

Ask Guardian for advice and support

Informal

Speak to your Line Manager
Senior Manager (verbal or
written) or Incident report

Local Resolution

Not Resolved

Raise with Freedom to Speak up
Guardian team

Resolved

Formal

Speak to your Line Manager,
Senior Manager or incident
report

Follow Policy, Raise with
Freedom to Speak up
Guardian

Assessment/review

Actions agreed,
Feedback Received

Resolved

SOLENT NHS TRUST CONTACTS WITHIN THIS POLICY

TITLE	NAME	EMAIL	TELEPHONE NUMBER
Associate Director of Corporate Affairs and Company Secretary	Rachel Cheal	Rachel.Cheal@solent.nhs.uk Or rachel.cheal1@nhs.net	023 810 32305
Chief Executive	Sue Harriman	Sue.Harriman@solent.nhs.uk or sueharriman@nhs.net	02381 032213
Chief Finance Officer and Deputy Chief Executive	Andrew Strevens	Andrew.Strevens@solent.nhs.uk or Andrew.strevens@nhs.net	02381 031395
Chief Medical Officer	Vacant		?
Chief Nurse	Jackie Ardley	Jackie.ardley@solent.nhs.uk	023 810 31792
Freedom to Speak up Non Executive Director	Jon Pittam	Contact via Company Secretary	
Freedom to Speak Up Lead Guardian	Pamela Permalloo-Bass	freedomtospeakup@solent.nhs.uk	023 810 30100
Quality and Safety team		Quality&Safety2@solent.nhs.uk	02381 030064

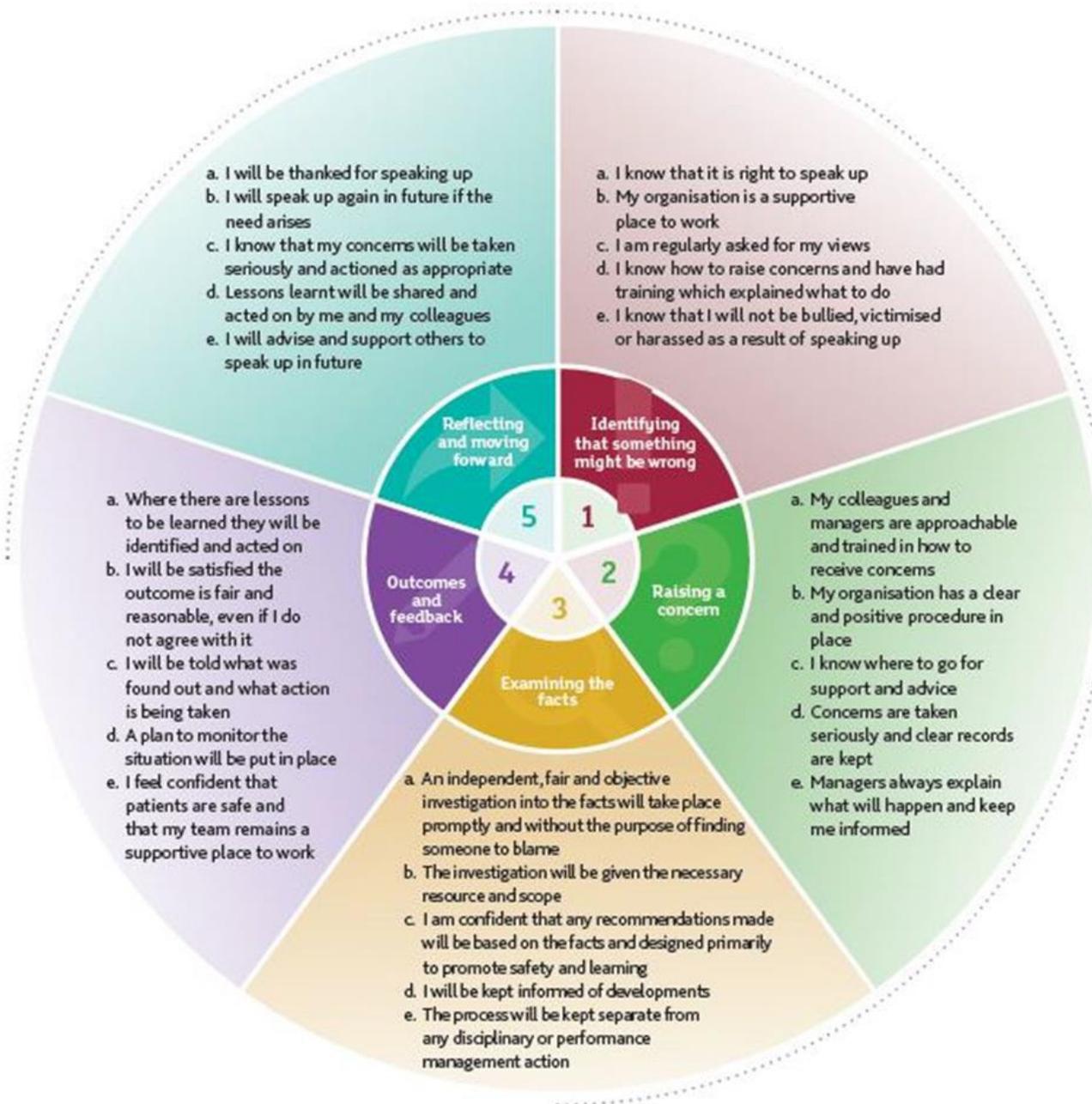
Information on speaking up and the details of the guardians is available on Solnet:

<http://intranet.solent.nhs.uk/staff/freedomtospeakup/pages/home.aspx>

EXTERNAL FREEDOM TO SPEAK UP CONTACTS

WIDER DISCLOSURES		
Care Quality Commission	Matters relating to Health and Social Care	030 0061 6161 www.cqc.org.uk
Healthwatch England	Matters relating to Health and Social Care	03000 683000
Health Education England	Matters relating to education and training for health care workers	https://hee.nhs.uk (merged with NHS Improvement in April 2019, new web address awaited)
NHS England	Matters relating to the delivery of primary medical, dental, ophthalmic and pharmaceutical services	england.nhs.uk
NHS Counter Fraud Authority	Matters relating to fraud, corruption and other unlawful activity in relation to health services in England	https://cfa.nhs.uk/reportfraud
NHS Improvement	Performance of English NHS Trusts, including clinical quality, governance and risk management	Improvement.nhs.uk/home (merged with NHS England in April 2019, new web address awaited)
Public Health England	Matters relating to Public Health	www.gov.uk/government/organisations/public-health-england
The Charity Commissioners for England and Wales		https://www.gov.uk/government/organisations/charity-commission
Food Standards Agency		Food.gov.uk
National Whistleblowing helpline for the NHS and Social Care		0300 311 22 33
Safeguarding	Links to all local Adults and Children and Young People Safeguarding boards and information on reporting	http://intranet.solent.nhs.uk/TeamCentre/QualityAndProfessionalStandards/Safeguarding/Pages/Home.aspx

Hampshire Fire and Rescue	Matters relating to Safety risks in commercial buildings such as blocked fire exits	023 9285 5180 Outside office hours (5pm – 9am) 023 8038 6390 Weekends 023 8038 6390 Csprotection.admin@hantsfire.gov.uk
Hampshire Constabulary		www.hampshire.police.uk 101 or 999 if an emergency
In all cases always call 999 in an emergency.		



1
I feel confident to speak up

2
I feel safe to speak up in future

3
Concerns are investigated

4
Speaking up makes a difference

5
Concerns are well received

Equality Analysis and Equality Impact Assessment

Equality Analysis is a way of considering the potential impact on different groups protected from discrimination by the Equality Act 2010. It is a legal requirement that places a duty on public sector organisations (The Public Sector Equality Duty) to integrate consideration of Equality, Diversity and Inclusion into their day-to-day business. The Equality Duty has 3 aims, it requires public bodies to have due regard to the need to:

- **eliminate unlawful discrimination**, harassment, victimisation and other conduct prohibited by the Equality Act of 2010;
- **advance equality of opportunity** between people who share a protected characteristic and people who do not;
- **foster good relations** between people who share a protected characteristic and people who do not.

Equality Impact Assessment (EIA) is a tool for examining the main functions and policies of an organisation to see whether they have the potential to affect people differently. Their purpose is to identify and address existing or potential inequalities, resulting from policy and practice development. Ideally, EIAs should cover all the strands of diversity and Inclusion. It will help us better understand its functions and the way decisions are made by:

- **considering the current situation**
- **deciding the aims and intended outcomes of a function or policy**
- **considering what evidence there is to support the decision and identifying any gaps**
- **ensuring it is an informed decision**

Equality Impact Assessment (EIA) *see supporting guidance on pg 3*

Step 1: Scoping and Identifying the Aims

Service Line / Department	Freedom to Speak Up		
Title of Change:	Freedom to Speak Up policy review		
What are you completing this EIA for? (Please select):	Policy	<i>(If other please specify here)</i>	
What are the main aims / objectives of the changes	The policy guides employees on the actions to take if they have a genuinely held concern about actual or prospective improper actions of a colleague or process which puts a service or patient safety at risk.		

Step 2: Assessing the Impact

Please use the drop-down feature to detail any positive or negative impacts of this document /policy on patients in the drop-down box below:

Protected Characteristic	Positive Impact(s)	Negative Impact(s)	Action to address negative impact: <i>(e.g. adjustment to the policy)</i>
Sex			No negative impacts on any characteristic
Gender reassignment			
Disability			
Age			
Sexual Orientation			
Pregnancy and maternity			
Marriage and civil partnership			

Religion or belief			
Race			

If you answer yes to any of the following, you MUST complete the evidence column explaining what information you have considered which has led you to reach this decision.

Assessment Questions	Yes / No	Please document evidence / any mitigations
In consideration of your document development, did you consult with others, for example, external organisations, service users, carers or other voluntary sector groups?)	Yes	Used National Guidance available
Have you taken into consideration any regulations, professional standards?	Yes	National FTSU Guidance
In drafting your document have you identified any discrimination issues, and if so how have they been mitigated?	No	

Step 3: Review, Risk and Action Plans

How would you rate the overall level of impact / risk to the organisation?	Low <input checked="" type="checkbox"/>	Medium <input type="checkbox"/>	High <input type="checkbox"/>
What action needs to be taken to reduce or eliminate the negative impact?	We collect data regarding the demographics of staff using the FTSU guardians which is reported to Board		
Who will be responsible for monitoring and regular review of the document / policy?	FTSU Guardians		

Step 4: Authorisation and sign off

I am satisfied that all available evidence has been accurately assessed for any potential impact on patients and groups with protected characteristics in the scope of this project / change / policy / procedure / practice / activity. Mitigation, where appropriate has been identified and dealt with accordingly.

Equality Assessor:	Pamela Permalloo Bass	Date:	10 th Feb 2020
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This section is to be agreed and signed by the Head of Diversity and Inclusion in agreement with the Diversity and Inclusion Strategy Lead:

Diversity and Inclusion authoriser name:	Pamela Permalloo Bass
Date:	10 th Feb 2020