

Freedom to Speak Up Policy

Date:

April 2025

Review date:

April 2026

Approved by:

Simon Buxton - Director

Contents

Introduction.....	2
Scope.....	2
What can I Speak Up About.....	2
We want you to feel safe to speak up.....	3
Who can speak up?.....	3
Who can I speak up to?.....	3
How should I speak up?.....	4
Advice and Support for those Speaking Up.....	4
What will we do?.....	5
Review.....	5
Senior Leaders' Oversight.....	5

Freedom to Speak Up Policy

Policy Lead: Simon Buxton - Director
Version No: 1.0
Date of issue: April 2025
Date to be reviewed: April 2026

Introduction

We welcome speaking up and we will listen. By speaking up at work you will be playing a vital role in helping us to keep improving our services for all service users and the working environment for our staff. This policy is for all staff and workers within our services.

We want to hear about any concerns you have, whichever part of the company you work in. Some groups in our workforce feel they are seldom heard or are reluctant to speak up. You could be an agency worker, bank worker, or locum. We also know that workers with disabilities, or from a minority ethnic background or the LGBTQIA+ community do not always feel able to speak up. This policy is for all workers, and we want to hear all our workers' concerns.

Scope

Individuals are protected by law against the harmful conduct of others and should not be subjected to harassment or bullying during employment. This policy is written in accordance with ACAS guidelines and supports Care Quality Commission Fundamentals of Care standards.

All NHS organisations and others providing health and care services in primary and secondary care in England are required to adopt this national policy as a minimum standard to help normalise speaking up for the benefit of service users and workers. Its aim is to ensure all matters raised are captured and considered appropriately.

What can I Speak Up About

You can speak up about anything that gets in the way of service user care or affects your working life. That could be something which doesn't feel right to you: for example, a way of working or a process that isn't being followed; you feel you are being discriminated against; or you feel the behaviours of others is affecting your wellbeing, or that of your colleagues or service users.

Speaking up is about all of these things.

Speaking up, therefore, captures a range of issues, some of which may be appropriate for other existing processes (for example, HR or service user safety/quality):

- Civility, Respect and Anti-Bullying & Harassment Policy
- Grievance Policy
- Tackling Violence & Aggression (from Members of the Public)
- Staff Investigation Procedure (in the Alleged Breaches on Employment Policies)
- Counter Fraud, Corruption and Bribery Policy
- Complaints, Concerns & Compliments (Service user Experience Policy)

- Equality and Diversity Policy

As a company, we will listen and work with you to identify the most appropriate way of responding to the issue you raise.

We want you to feel safe to speak up

You speaking up to us is an asset because it helps us identify opportunities for improvement that we might not otherwise know about. We will not tolerate anyone being prevented or deterred from speaking up or being mistreated because they have spoken up.

Who can speak up?

Anyone working within our Company. This encompasses any healthcare professionals, non-clinical workers, receptionists, directors, managers, contractors, volunteers, students, trainees, junior doctors, locum, bank and agency workers, and former workers.

Who can I speak up to?

Speaking up internally

Most speaking up happens through conversations with supervisors and line managers where challenges are raised and resolved quickly. We strive for a culture where that is normal, everyday practice and encourage you to explore this option – it may well be the easiest and simplest way of resolving matters.

However, you have other options in terms of who you can speak up to, depending on what feels most appropriate to you:

- Senior manager, partner, or director with responsibility for the subject matter you are speaking up about.
- The service user safety team or clinical governance team (where concerns relating to service user safety or wider quality)

Any member of the team who is working with you on your concerns will ensure that people who speak up are thanked for doing so, that the issues they raise are responded to, and that the person speaking up receives feedback on the actions taken.

Our senior lead responsible for Freedom to Speak Up is the Registered Manager, whom is responsible for reviewing the effectiveness of our FTSU arrangements.

Speaking up externally

If you do not want to speak up to someone within the company, you can speak up externally to the below parties (where applicable):

- Care Quality Commission (CQC) for quality and safety concerns about the services it regulates – you can find out more about how the CQC handles concerns [here](#).
- NHS England for concerns about:
 - GP surgeries
 - Dental practices
 - Optometrists
 - Pharmacies

- How NHS companies and foundation companies are being run (this includes ambulance companies and community and mental health companies)
- NHS procurement and service user choice
- the national tariff

NHS England may decide to investigate your concern themselves, ask the company or another appropriate organisation to investigate (usually with their oversight) and/or use the information you provide to inform their oversight of the relevant organisation.

The precise action they take will depend on the nature of your concern and how it relates to their various roles.

Please note that neither the Care Quality Commission nor NHS England can get involved in individual employment matters, such as a concern from an individual about feeling bullied.

- NHS Counter Fraud Agency for concerns about fraud and corruption, using their online reporting form or calling their freephone line 0800 028 4060.

How should I speak up?

You can speak up to any of the people or organisations listed above in person, by phone or in writing (including email).

Confidentiality

The most important aspect of you speaking up is the information you can provide, not your identity.

You have a choice about how you speak up:

- Openly: you are happy that the person you speak up to knows your identity and that they can share this with anyone else involved in responding.
- Confidentially: you are happy to reveal your identity to the person you choose to speak up to on the condition that they will not share this without your consent.
- Anonymously: you do not want to reveal your identity to anyone. This can make it difficult for others to ask you for further information about the matter and may make it more complicated to act to resolve the issue. It also means that you might not be able to access any extra support you need and receive any feedback on the outcome.

In all circumstances, please be ready to explain as fully as you can the information and circumstances that prompted you to speak up.

Advice and Support for those Speaking Up

You can also contact the following organisations who can offer you advice and support when raising a concern:

[Speak Up Direct](#) provides free, independent, confidential advice on the speaking up process.

The charity [Protect](#) provides confidential and legal advice on speaking up.

The [Trades Union Congress](#) provides information on how to join a trade union.

The [Law Society](#) may be able to point you to other sources of advice and support.

The [Advisory, Conciliation and Arbitration Service](#) gives advice and assistance, including on early conciliation regarding employment disputes.

What will we do?

The matter you are speaking up about may be best considered under a specific existing policy/process; for example, our process for dealing with bullying and harassment. If so, we will discuss that with you. If you speak up about something that does not fall into an HR or service user safety incident process, this policy ensures that the matter is still addressed.

Resolution and investigation

We support our managers/supervisors to listen to the issue you raise and take action to resolve it wherever possible. In most cases, it's important that this opportunity is fully explored, which may be with facilitated conversations and/or mediation.

Where an investigation is needed, this will be objective and conducted by someone who is suitably independent (this might be someone outside our company or from a different part of the company) and trained in investigations. It will reach a conclusion within a reasonable timescale (which we will notify you of), and a report will be produced that identifies any issues to prevent problems recurring.

Any employment issues that have implications for you/your capability or conduct identified during the investigation will be considered separately.

Communicating with you

We will treat you with respect at all times and will thank you for speaking up. We will discuss the issues with you to ensure we understand exactly what you are worried about. If we decide to investigate, we will tell you how long we expect the investigation to take and agree with you how to keep you up to date with its progress. Wherever possible, we will share the full investigation report with you (while respecting the confidentiality of others and recognising that some matters may be strictly confidential; as such it may be that we cannot even share the outcome with you).

How we learn from your speaking up

We want speaking up to improve the services we provide for service users and the environment our staff work in. Where it identifies improvements that can be made, we will ensure necessary changes are made, and are working effectively. Lessons will be shared with teams across the organisation, or more widely, as appropriate.

Review

We will seek feedback from workers about their experience of speaking up. We will review the effectiveness of this policy and our local process annually, with the outcome published and changes made as appropriate.

Senior Leaders' Oversight

Our most senior leaders will receive a report at least annually providing a thematic overview of speaking up by our staff to our FTSU guardian(s) i.e. the Registered Manager.