

REFERENCE NUMBER OF DOCUMENT:	11.2.362.02
COMMITTEE IDENTIFICATION:	Galago Directors
SECRETARIAT:	MS
DOCUMENT TYPE:	External Policy
DOCUMENT LANGUAGE:	E
THIS POLICY IS FOR:	All Staff including Agency Workers (temporary workers), Commissioners and Service Users

RAISING CONCERNS, FREEDOM TO SPEAK UP AND WHISTLEBLOWING

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RAISING CONCERNS, FREEDOM TO SPEAK UP AND WHISTLEBLOWING POLICY AND PROCEDURE

The Aim of this policy is to ensure that Nursing Direct Healthcare Limited (hereinafter referred to as "Nursing Direct") as a care provider, fulfils its legal and ethical obligations by promoting a culture of openness, transparency, and compliance. This policy ensures that all staff, including agency workers, are aware of their right to raise concerns with Nursing Direct or the Care Quality Commission (CQC) without fear of punishment or negative consequences. Concerns may relate to malpractice, risks, misconduct, unlawful actions, or failures to act in accordance with laws, regulations, or best practice guidelines, which may harm or pose a risk to service users, staff, or the wider public.

Nursing Direct is committed to fostering an environment where raising concerns is integral to daily operations. Staff including Agency Workers are encouraged and expected to report any suspected wrongdoing or attempts to conceal it, with clear guidance provided on how to do so. Concerns covered include fraud, abuse, criminal acts, financial misconduct, unethical behaviour, and other matters outlined in the Public Interest Disclosure Act 1998.

Staff including Agency Workers can raise concerns without fear of retaliation, and any form of intimidation or bullying will be dealt with swiftly. Disclosures made in good faith are protected, ensuring staff do not face detriment or unfair dismissal. Regular training ensures staff are aware of the process, following the framework established by the "Freedom to Speak Up" report by Sir Robert Francis (2015) to embed the act of raising issues as part of the normal operational work routine within the service.

1. PURPOSE

1.1 To ensure that all staff working at Nursing Direct understand the importance of raising a concern, sometimes also referred to as 'speaking up' or 'whistleblowing'.

1.2 The purpose of this policy is to:

- Encourage all staff including Agency Workers to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected
- To provide all staff including Agency Workers with guidance as to how to raise those concerns
- To reassure staff including Agency Workers that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken

1.3 This policy and procedure do not apply to personal grievances. If a member of the workforce has concerns regarding their own employment situation, they should refer to the Grievance Policy and Procedure.

1.4 Nursing Direct recognises the importance of maintaining a policy and procedure that aligns with the regulatory requirements of the Care Quality Commission's (CQC) Key Lines of Enquiry and Quality Statements. This policy ensures compliance with obligations related to Raising Concerns, Freedom to Speak Up, and Whistleblowing, including the following:

- Ensuring systems, processes and practices keep service users and staff safe and safeguarded from abuse
- Ensuring that risks to service users, staff, including Agency Workers, and other stakeholders are assessed, monitored, and managed, maintaining a safe environment that supports their well-being and respects their freedom.
- Supporting all staff including Agency Workers in learning from mistakes and making necessary improvements, fostering a culture of openness, continuous learning, and compliance.
- Ensuring the service is well-led with a shared vision and culture, driven by capable, compassionate, and inclusive leaders. This promotes a clear, credible strategy to deliver high-quality care and support, fostering a person-centred, open, inclusive, and empowering environment that achieves positive outcomes for both service users and staff including Agency Workers.

1.5 **Relevant Legislations, Rules, and Regulations:**

To meet the legal requirements of the regulated activities that Nursing Direct Healthcare Limited is registered to provide:

- The Criminal Justice and Courts Act 2015
- The Enterprise and Regulatory Reform Act 2013
- The Care Act 2014
- Employment Rights Act 1996
- Public Interest Disclosure Act 1998
- The Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2012
- The "Freedom to Speak Up" report by Sir Robert Francis, published in 2015
- CQC Whistleblowing guidance

2. SCOPE

2.1 The following roles may be affected by this policy:

- All staff including Agency Workers

2.2 The following Service Users may be affected by this policy:

- Service Users
- Family members/Next of Kin
- Legal Representatives/Advocates

2.3 The following stakeholders may be affected by this policy:

- Commissioners
- Local Authority
- Care Quality Commission
- External health professionals
- Other relevant stakeholders

3. OBJECTIVES

3.1 All staff including Agency Workers have a responsibility to uphold the ethical and regulatory standards of quality care as a shared goal. They will work collaboratively with all stakeholders to promote a culture of openness and transparency. This includes enabling staff including Agency Workers to raise concerns about suspected or actual wrongdoing or malpractice, such as misconduct, unlawful actions, unsafe working conditions, risks to the well-being of service users or staff, breaches of duties or obligations, and attempts to cover such issues.

3.2 Nursing Direct acknowledges the importance of the following objectives across all its operational areas:

- To ensure Safety: Identifies and addresses risks to the safety of staff including Agency Workers helping to maintain high safety standards.
- To uphold Quality: Exposes poor or unsafe practices that could compromise the quality of care.
- To promote Transparency and Accountability: It encourages openness and responsibility.
- To prevent Wrongdoing: Empowers staff, including agency workers, to speak up without fear and act to limit those who might engage in unethical or harmful practices.

3.3 This policy will provide the means for ensuring that staff including Agency Workers can confidentially raise legitimate concerns about malpractice or misconduct. These concerns should be escalated internally within the organisation at the earliest opportunity, without fear of reprisal.

If internal escalation is not possible or proves ineffective, staff including Agency Workers may raise the issue with external bodies such as the Care Quality Commission (CQC), other relevant regulatory authorities, or independent advisory organisations. Whistleblowers are protected under the Public Interest Disclosure Act 1998, safeguarding them from unfair treatment or dismissal. Confidentiality is guaranteed, and whistleblowing can be done anonymously to protect the identity of the whistleblower during the investigation process.

3.4 This objective is supported by key whistleblowing principles that align with Nursing Direct's commitment to fostering an open environment where staff including Agency Workers feel empowered to speak up and raise concerns. By implementing a policy that can be adapted as needed, Nursing Direct ensures greater consistency in how staff including Agency Workers are supported, while also allowing flexibility for continuous improvement. This approach promotes a positive organisational culture built on openness, best practices, and compliance.

4. POLICY

4.1 The Registered Manager and the Nominated Individual of Nursing Direct have overall management responsibility for this policy and procedure.

4.2 Nursing Direct is committed to a high standard of care, to honesty, openness and decency in all its activities and in line with the requirements of the duty of candour. It is recognised that Service User safety must come first at all times and, whilst it can be difficult for staff including Agency Workers to raise concerns about the practice of others, including managers, the implications of not raising those concerns are potentially very serious for Nursing Direct, its staff, including Agency Workers, and most importantly for those receiving its services.

4.3 Nursing Direct is dedicated to fostering a workplace culture where raising concerns is an integral part of our operations. All staff members, including Agency Workers, are actively encouraged and expected to voice any concerns they may have about conduct that they reasonably believe indicates wrongdoing or an effort to conceal such actions.

4.4 Nursing Direct promotes a culture of openness and respect free from bullying in all interactions with staff including Agency Workers as well as with all individuals and stakeholders we engage with in the provision of our services and legal relations. Any form of intimidation or bullying directed at individuals who raise concerns will be considered a serious violation and will be addressed promptly and decisively.

4.5 Nursing Direct acknowledges that effective and transparent communication is crucial for addressing any wrongdoing or malpractice. This commitment is supported by our governance structure and senior management, ensuring that the organisation can successfully uphold its standards and values.

4.6 Nursing Direct recognises that staff including Agency Workers are likely to be the first to realise that there may be something seriously wrong within the organisation but may feel that speaking up would be disloyal to colleagues or their employer who may, under certain circumstances, face criminal charges. They may also fear harassment or victimisation and fear a loss of their job or a reduction in work hours.

4.7 Nursing Direct will not tolerate the ill treatment, including any bullying or harassment, of anyone who raises a concern. It will ensure that any individual who raises a concern can do so confidentially in line with the Public Interest Disclosure Act 1998 (PIDA).

4.8 Nursing Direct will ensure that any individual who raises a genuine concern under this policy will not be at risk of termination of their employment or suffer any form of reprisal which includes, but is not limited to, loss or reduction of hours or changes to regular working patterns because of it.

4.9 Nursing Direct will ensure that it follows not only the law on whistleblowing, but also best practice and guidance from the NHS and regulatory bodies including the Care Quality Commission.

5. PROCEDURE

5.1 The policy outlines an effective procedure for raising concerns and fostering a culture of openness where there is freedom to Speak Up. It considers various approaches, as follows:

5.1.1 OPENNESS

- **Transparency:** Address concerns openly throughout the process while respecting the confidentiality of all parties involved.
- **Accountability:** Establish clear governance arrangements to ensure accountability for implementing and monitoring the procedure for raising concerns.
- **Sharing Lessons Learned:** After an investigation, share insights and improvements widely within the organisation, ensuring that everyone benefits from the lessons learned.

5.1.2 FOCUS ON IMPROVEMENT

- **Encouragement to Report:** Actively encourage all staff, including Agency Workers, to report any safety or malpractice concerns as part of their daily work, even before initiating a formal procedure.
- **Transparent Culture:** Ensure the procedure promotes a transparent culture that utilises reported concerns to identify areas for learning and improvement, as well as to share best practices in service delivery.
- **Prompt Investigations:** Implement systems to ensure that all reported whistleblowing concerns are investigated swiftly and appropriately, with monitoring of their handling.

5.1.3 OBJECTIVITY, IMPARTIALITY, AND FAIRNESS

- **Fact-Based Procedures:** Ensure that procedures for raising concerns are objective, evidence-based, and focused on facts and circumstances, rather than assumptions.
- **Objective Fact Gathering:** Collect relevant information in an objective, confidential and sensitive way.
- **Impartial Investigations:** Individuals involved in investigations must be impartial, independent, and accountable, avoiding any conflicts of interest.
- **Fairness:** Ensure that the procedures are fair to all parties involved, including those raising concerns and those being investigated.

5.1.4 ACCESSIBILITY

- **Clear Communication:** Provide clear and accessible guidelines for raising concerns, using plain language and avoiding jargon. If technical terms are necessary, ensure they are explained.
- **Welcoming Environment:** Senior managers should foster an environment that welcomes concerns and ensures they are handled by individuals who have the appropriate skills and knowledge to investigate the concern.
- **Publicising Standards:** Ensure that the National Whistleblowing Standards and the organisation's procedures for raising concerns are well-publicised and easily accessible.

5.1.5 PROVIDING SUPPORT

- **Awareness Raising:** Increase awareness among staff, including Agency Workers, about available support and protection, the importance of speaking up, and confidentiality measures.
- **Respectful Support:** Staff including Agency Workers raising concerns should be treated with dignity and respect throughout the process, receiving all necessary support and guidance.
- **Alternative Reporting Methods:** Offer alternative reporting options for those uncomfortable approaching a member of the management team, including access to a confidential and impartial contact.
- **Protection from Retaliation:** Ensure that individuals raising concerns are protected from victimisation or adverse treatment, including bullying, harassment, and any negative impacts on their contracts or professional reputation.

5.1.6 SIMPLICITY AND TIMELINESS

- **Clear Timelines:** Timescales should be clearly informed and met wherever possible.
- **Thorough Investigations:** Conduct detailed and evidence-based investigations. If a case is complex and timelines cannot be met, inform the staff including Agency Worker who raised the concern (and other relevant parties) of the reasons for the delay and provide a revised timeline for completion.

5.2 Raising Concerns

All staff have a duty to raise concerns regarding inappropriate behaviour, unlawful conduct, poor practice or behaviour to ensure standards of quality care.

5.3 Freedom to Speak Up (FTSU)

All Staff including Agency workers at Nursing Direct are encouraged to speak up about anything that gets in the way of doing a great job.

Nursing Direct will have a Freedom to Speak Up Guardian who supports staff including Agency Workers to speak up when they feel that they are unable to in other ways.

5.4 Whistleblowing

Staff including Agency Workers can report certain types of wrongdoing, usually something seen at work - though not always. The wrongdoing disclosed must be in the public interest. This means it must affect others, for example the general public.

5.5 This procedure is intended to provide a safeguard to enable staff including Agency Workers to raise concerns about one or more of the following that has occurred, is occurring, or is likely to occur. These Qualifying Disclosures (see definition) mean that staff can raise a concern about risk, malpractice or wrongdoing that they think is harming the services, might harm or has harmed in the past any aspect of the services that Nursing Direct delivers. A few examples of this might include (but are by no means restricted to):

- Unsafe care
- Unsafe working conditions
- Inadequate induction or training for staff
- Lack of, or poor, response to a reported Service User safety incident
- Suspicions of fraud (which can also be reported to the local counter-fraud team)
- Damaging the environment - e.g. disposing of materials or waste incorrectly, for example, flushing medicines or syringes down the toilet or sink

- A bullying culture (across a team or organisation rather than individual instances of bullying)
- Incidents of unsafe staffing, falsification of timesheets, Service User records or other clinical or care records
- Failure to investigate claims of physical or sexual assault
- Physical, verbal or sexual abuse of any Service User, colleague or other person on the premises of Nursing Direct Healthcare Limited
- Breaching the Data Protection Act

This policy should not be used for complaints relating to staff including Agency Workers' own personal circumstances, such as the way they have been treated at work. In those cases, the individual should use the Grievance Policy and Procedures.

5.6 **How to Raise a Concern - Step 1**

- If staff including Agency Workers have a genuine concern about a risk, malpractice or wrongdoing at work, it is hoped that they feel they will be able to raise it first with management
- This may be done verbally or in writing
- It is better to raise a concern as soon as it arises
- Where possible, unless, for example, where the concern relates to a safeguarding matter, the concerns raised will be treated confidentially
- Management will inform them if they cannot keep the concern confidential
- The Registered Manager has overall responsibility for concerns raised and the management team may need to share the concern with the Registered Manager.

5.7 **How to Raise a Concern - Step 2**

- If staff including Agency Workers do not feel they can raise the concern with management or the concern relates to or involves management (or they have raised it with management and no action has been taken), staff including Agency Workers should then escalate their concerns to the Registered Manager

5.8 **How to Raise a Concern - Step 3**

- If staff including Agency Workers do not feel that the Registered Manager or Nursing Direct will appropriately handle their concerns, the staff including Agency Worker may report their concerns directly to the Care Quality Commission on 03000 616161 or through its website.
- The CQC will not disclose the member of staff's identity without their consent unless there are legal reasons requiring the CQC to do so, e.g. where the information is about a child or vulnerable adult who is at risk

5.9 **Protection and Support**

It is understandable that whistleblowers are sometimes worried about possible repercussions. Nursing Direct aims to encourage openness and will support staff including Agency Workers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an individual believes that they have suffered any such treatment, they should inform the Registered Manager immediately. If the matter is not remedied, the individual should raise it formally using the Grievance Procedure at Nursing Direct.

Anyone who threatens or retaliates against whistleblowers in any way may be subject to disciplinary action. Prior to raising a concern, the staff including Agency Workers may want to get free, independent and confidential advice from:

- The Whistleblowing Helpline for NHS and Social Care; or
- Public Concern at Work (a whistleblowing charity)

5.10 **Investigation**

The management team/Registered Manager may arrange a meeting to discuss the concern. If so, the individual may bring a colleague or union representative to any meetings under this policy. The individual's companion must respect the confidentiality of the disclosure and any subsequent investigation.

The Registered Manager, in consultation with Nursing Direct, shall have discretion over the nature of the investigation into concerns raised, including, where it is considered appropriate, the involvement of others such as Adult Social Services or auditors. If there is evidence of criminal activity, the Police will be informed.

Nursing Direct cannot always guarantee the outcome the individual is seeking, however Nursing Direct will try to deal with the individual's concern in a fair and appropriate way. If the individual is not happy with the way in which the concern has been handled, they can raise it with one of the alternative contacts stated.

5.11 **Registered Manager and Nursing Direct Responsibility**

- Responsibility for dealing with any concerns reported will lie with the Registered Manager.
- If the concerns relate to the Registered Manager, concerns should be escalated to Nursing Direct's senior management team.
- If the concerns involve both the Registered Manager and Nursing Direct or if an individual is fulfilling both roles, the member of staff can contact the CQC.

5.12 **Protected Disclosures and Safeguarding**

- When a safeguarding concern is raised by staff, including Agency Workers, Local Authorities, Integrated Care Boards (ICBs), other service users, or any other relevant stakeholders, the organisation's Safeguarding policies and procedures will be strictly followed. These procedures align with national safeguarding legislation and guidance, ensuring that concerns are promptly addressed for both children and adults at risk.
- If a safeguarding concern is received that implicates the management team at Nursing Direct, staff, including Agency Workers, must refer the issue to the local Adult Protection Team (for concerns regarding adults) or Children's Social Care Services (for concerns involving children). In cases involving adults, the Adult Protection Team will take responsibility for informing and coordinating with other agencies, including police and healthcare services, in accordance with local safeguarding protocols.
- All staff including Agency Workers are reminded that disclosures related to safeguarding concerns should be treated as protected disclosures under whistleblowing legislation. This means that individuals making such reports are legally protected from retaliation, provided the disclosures are made in good faith and follow appropriate reporting channels.

5.13 **Raising a Concern - Timescales**

The individual with whom the concern is raised will acknowledge the concern within locally agreed timescales and in line with best practice. The investigating officer will be confirmed to the staff including Agency Worker along with any further information required including contact information and an estimate of the likely timescales involved.

5.14 Where possible, the management team will feed back to the staff including Agency Worker who raised the concern on the outcome of any investigation, although this may not always be possible in full due to the nature of the disclosure.

5.15 A record of the information provided, and details of the proceedings will be kept in line with best practice.

5.16 **False, Malicious, Vexatious Allegations**

All whistleblowing concerns will be investigated. However, if staff including Agency Workers are found to have made allegations maliciously and/or not in good faith, disciplinary action may be taken. Staff including Agency Workers will never be disciplined for raising a concern, so long as they follow the whistleblowing procedure or make disclosures in accordance with the Public Interest Disclosure Act 1998 (PIDA).

5.17 **Bullying and Harassment of Whistleblowers**

Unless an employer has taken reasonable steps to prevent this type of victimisation by co-workers, it will be deemed liable for the acts of its staff. It is therefore no longer enough to deal with incidents of bullying or harassment as and when they arise, on a case-by-case basis. The only basis upon which an employer will now be able to defend itself against liability for the actions of its staff including Agency Workers will be by proactive steps. In order to demonstrate a "reasonable steps" defence, an employer will need to anticipate conduct such as bullying and harassment. To avoid incidents of bullying or harassment occurring, Nursing Direct will take the following steps:

- Adhere to this Whistleblowing Policy
- Embed a culture of openness and transparency
- Communicate the policy
- Offer any necessary training to ensure that it is put into effect
- Take action if any worker bullies or harasses a whistleblower

5.18 **Employment Contracts, Whistleblowing and Confidentiality**

The PIDA protects Whistleblowers from being restricted to bring claims of whistleblowing. Nursing Direct will seek legal or Human Resource advice to ensure that (where relevant) any agreements between Nursing Direct and the staff including Agency Worker does not prevent them from issuing a whistleblowing claim.

5.19 **Monitoring, Review, Continuous Improvement**

Nursing Direct strives through its Good Governance and Quality Assurance policies and procedures to ensure that as an organisation it has a clear review process in place that seeks to foster a culture of continuous improvement and learning. Nursing Direct invites and actively seeks feedback, especially from those who may be faced with particular barriers to speaking up and raising concerns.

5.20 **External Disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases it should not be necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for individuals to report their concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. Nursing Direct strongly encourages staff including Agency Workers to seek advice before reporting a concern to anyone external.

Whistleblowing concerns usually relate to the conduct of staff or service provisions, but they may sometimes relate to the actions of a third party, such as a supplier or service provider. In some circumstances, the law will protect an individual if they raise the matter with the third party directly. However, Nursing Direct encourages staff including Agency Workers to report such concerns internally first, in line with this policy.

6. **DEFINITIONS**

6.1 **All/relevant staff including Agency Workers**

6.1.1 **Staff**

Denotes the employees of Nursing Direct Healthcare Limited.

6.1.2 **Agency Workers**

Refers to individuals who are contracted with Nursdoc Limited or another employment business as an Agency Worker (temporary worker) provided to Nursing Direct Healthcare Limited to perform care services under the direction of Nursing Direct.

6.2 **Nursing Direct**

Nursing Direct, also known as Nursing Direct Healthcare Limited, is the entity regulated by the CQC (Care Quality Commission) and responsible for the care service provision, contracted to provide homecare services to service users in their homes, in placements, essential healthcare facilities and in the community.

6.3 **Nursdoc Limited**

As the sister company to Nursing Direct Healthcare Limited, Nursdoc Limited acts as an employment business, specialising in providing staffing solutions to the healthcare sector.

6.4 **CQC (Care Quality Commission)**

CQC throughout this policy, the term "CQC" refers to the Care Quality Commission (CQC) which is the independent regulator of health and social care in England.

6.5 **Whistleblower**

The term 'whistleblower' is used to describe people who make a 'qualifying disclosure' about a genuine concern at work. Where a worker suffers a detriment or is dismissed as a result, then they may have certain employment protections under the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998, often referred to as 'PIDA')

6.6 Qualifying Disclosure

- Qualifying disclosures are disclosures of information where the worker reasonably believes (and it is in the public interest) that one or more of the following matters is either happening, has taken place, or is likely to happen in the future:
 - A criminal offence
 - The breach of a legal obligation
 - A miscarriage of justice
 - A danger to the health and safety of any individual
 - Damage to the environment
 - Deliberate attempt to conceal any of the above

6.7 Public Interest

A disclosure made in the interest of the public, i.e. not relating to an individual such as in a grievance case

6.8 Grievance or Private Complaint

A dispute about the employee's own employment position without a public interest aspect

6.9 PIDA

Public Interest Disclosure Act 1998 - Legislation which provides protection to workers who make disclosures in the public interest

6.10 Criminal Justice and Courts Act 2015

Legislation which lays out the offences involving ill-treatment or wilful neglect by a person providing health or social care

6.11 Vicarious Liability

Vicarious liability refers to a situation where someone is held responsible for the actions or omissions of another person. In a workplace context, an employer can be liable for the acts or omissions of its employees, provided it can be shown that they took place in the course of their employment

6.12 Whistleblowing


The disclosure of information which relates to suspected wrongdoing or dangers at work. This may include (but is not limited to):

- 6.12.1 Criminal activity
- 6.12.2 Failure to comply with any legal (or professional) obligation or regulatory requirements
- 6.12.3 Miscarriages of justice
- 6.12.4 Danger to health and safety
- 6.12.5 Damage to the environment
- 6.12.6 Bribery
- 6.12.7 Facilitating tax evasion
- 6.12.8 Financial fraud or mismanagement
- 6.12.9 Breach of internal policies and procedures
- 6.12.10 Conduct likely to damage the reputation or financial wellbeing of the organisation
- 6.12.11 Unauthorised disclosure of confidential information
- 6.12.12 Negligence
- 6.12.13 The deliberate concealment of any of the above matters

OUTSTANDING PRACTICE

To be 'outstanding' in this policy area you could provide evidence that:

- Staff including Agency Workers report that Nursing Direct is extremely open, transparent and actively supports and encourages whistleblowing
- Nursing Direct enables staff including Agency Workers to raise concerns by providing support (such as a helpline) from an independent agency in regard to whistleblowing concerns
- Nursing Direct has a designated Whistleblowing Champion and evidence of the proactive nature of this role and how it is a success
- Nursing Direct uses lessons learnt from concerns, without breaching confidentiality, to ensure continuous improvement of the service.

COMPLETED DATE:	
SIGN OFF DATE:	
REVIEW DATE:	
SIGNED:	 Marc Stiff – Group Managing Director