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Harrogate and District

NHS Foundation Trust

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CS People and Culture

Policy

Speaking Up Policy

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1. INTRODUCTION

1.1. Purpose

NHS England have developed a national policy in relation to Freedom to Speak Up and Harrogate and District NHS Foundation Trust (HDFT) and Harrogate Integrated Facilities (HIF) have adopted this national policy, with specific additions relevant to the Trust. This Policy will support the effort to help normalise speaking up for the benefit of service users, patients and workers. Its aim is to ensure all matters raised are captured and considered appropriately. It is supplemented by a procedure for the freedom to speak up process.

1.2. Scope

This policy applies to all employees, workers and volunteers at Harrogate and District NHS Foundation Trust.

The [NHS People Promise](#) commits to ensuring that “we each have a voice that counts, that we all feel safe and confident to speak up, and take the time to really listen to understand the hopes and fears that lie behind the words”.

HDFT welcomes 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 patients and the working environment for our staff.

HDFT wants to hear about any concerns you have, whichever part of the organisation you work in. We know some groups in our workforce feel they are seldom heard or are reluctant to speak up. You could be an agency worker, bank worker, locum, volunteer or student. We also know that workers who are disabled or from a minority ethnic background or the LGBTQ+ community do not always feel able to speak up.

This policy is for all workers and we want to hear all our workers' concerns.

We ask all our workers to complete the online training on speaking up. The online module on listening up is specifically for managers to complete and the module on following up is for senior leaders to complete. This training is available via our internal training platform.

You can find out more about what Freedom to Speak Up (FTSU) is in these [videos](#)

1.3. Definitions

- **Datix** – the Trust's electronic system for recording, investigating and learning from incidents
- **Designated Officers** – in respect of this policy these are the Executive Director of Nursing, Midwifery & AHPs, Director of People and Culture and the Executive Medical Director.
- **Employees** - all staff employed under a substantive contract, on a fixed-term contract (including secondees) who are paid by the Trust or with a bank/locum contract.
- **Grievance** – a personal complaint about an individual's employment and therefore not within the remit of this policy. See the Trust's Grievance Policy.
- **Trade Union/Professional organisation** – an independent body which represents the interests of its members.
- **Volunteer** - is any person who undertakes voluntary work on the Trust's behalf, having completed the Trust Volunteer recruitment process and induction. It is undertaken by choice, and it is unpaid. This includes Lay Readers and Lay Representatives. Volunteers are an additional resource within the Trust and are NOT intended to replace paid staff. They complement and/or enhance the care and support that HDFT provides to our patients and service users.
- **Whistleblowing** – generally speaking a whistleblowing concern is about risk, malpractice or wrongdoing that affects others. It could be something which adversely affects patients, the public or other staff. The individual raising a concern would be a witness to the fact or would have a reasonable belief about the fact rather than being a complainant.
- **FTSUG** – Freedom to Speak Up Guardian
- **GMC** – General Medical Council
- **HPC** – Health and Care Professions Council
- **HDFT/The Trust** – Harrogate and District NHS Foundation Trust
- **HR** – Human Resources
- **NMC** – Nursing and Midwifery Council

2. RAISING A CONCERN

Details about speaking up, contacts and resources are also available from the [Freedom To Speak Up](#) page on the Trust intranet pages (Sharepoint).

2.1. What concerns can I raise?

You can raise a concern about anything that gets in the way of patient care or affects your working life. That could be something which does not feel right to you: for example:

- a way of working or a process that is not 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 patients. Speaking up is about all of these things.

Speaking up, captures a range of issues, some of which may be appropriate for other existing processes (for example, grievances investigated by HR colleagues, a patient safety incident reported through our Datix system or individual discussions with Trade Unions). That is fine, as an organisation, we will listen and work with you to identify the most appropriate way of responding to the issue you raise.

Trust policies and procedures can be accessed on the intranet via the PolicyStat link [PolicyStat Home](#)

2.2. Feel safe to raise your concern

It is important to develop a climate of openness around reporting concerns where everyone feels comfortable raising concerns without fear of exposure or of suffering any detriment. Speaking up is an opportunity for improvement that we might not otherwise know about.

HDFT will not tolerate anyone being prevented or deterred from speaking up or being mistreated because they have spoken up.

2.3. Confidentiality

We hope you will feel comfortable raising your concern openly, but we also appreciate that you may want to raise it confidentially. This means that while you are willing for your identity to be known to the person you report your concern to, you do not want anyone else to know your identity. Therefore, we will keep your identity confidential, unless

required to disclose it by law (for example, by the police).

You can choose to raise your concern anonymously, without giving anyone your name, but that may make it more difficult for the Trust to investigate thoroughly and will not make it possible for us to give you feedback on the outcome.

2.4. Who can Speak Up?

Anyone who works (or has worked) in the NHS, or for an independent organisation that provides NHS services can raise concerns. This includes Harrogate Integrated Facilities (HIF) staff, agency workers, temporary workers, students, volunteers and governors.

2.5. 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. For example, you may be a student on placement and feel that your tutor is the most appropriate person to support you with this. Your options include:

- The senior manager or director with responsibility for the subject matter you are speaking up about.
- The Quality Team on 01423 554449 or follow the Trust's processes for reporting an incident by completing a Datix form. See the [Safety Event Policy](#) for more information. Where appropriate, this will result in a full investigation being undertaken and a course of action agreed.
- Local counter fraud specialist (where concerns relate to fraud):
rosie.dickinson1@nhs.net 07825 228175 and steven.moss@nhs.net 07717 356707.
- Our Freedom to Speak up Guardians using hdft.freedomto.speakup@nhs.net or directly using their individual contact details.
- The People & Culture Directorate such as your directorate HR Advisors listed on the [Operational HR](#) intranet page. Alternatively, you can call the HR Advisors on 01423 554537 and they will direct your call to the most appropriate person,
- You have the right to consult, seek guidance and where appropriate, support from your trade union, professional organisation.
- Our senior leads responsible for Freedom to Speak Up: Executive Director for

Nursing, Midwifery and Allied Health Professionals and Associate Director of Quality and Corporate Affairs - they provide senior support for our speaking-up guardian and are responsible for reviewing the effectiveness of our FTSU arrangements.

- Fairness Champions are members of staff who have had additional training and who are committed to supporting speaking up across the organisation. Contact details of Fairness Champions can be found on the Speaking Up intranet page [Freedom To Speak Up](#)
- Our non-executive director responsible for Freedom to Speak Up Laura Robson, laura.robson12@nhs.net – this role provides more independent support for the guardian; provide a fresh pair of eyes to ensure that investigations are conducted with rigor; and help escalate issues, where needed.
- The Guardian of Safe Working Hours (GOSWH) is a senior person, independent of the management structure of the Trust. The GOSWH is responsible for protecting the safeguards outlined in the 2016 Terms and Conditions of Service (TCS) for Doctors and Dentists in Training. The GOSWH will ensure that issues of compliance with safe working hours are addressed, as they arise, with the doctor and/or the Trust employer, as appropriate; and will provide assurance to the Trust Board (or equivalent body) that doctors' working hours are safe. Please see [Speaking Up – who to contact](#) for details of the GOSWH for the Trust.

Speaking up externally

If you do not want to speak up to someone within our organisation or the concern relates to wider NHS services outside of HDFT, you can speak up externally to:

- [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 trusts and foundation trusts are being run (this includes ambulance trusts and community and mental health trusts)
 - NHS procurement and patient choice
 - the national tariff

NHS England may decide to investigate your concern themselves, ask your employer (HDFT) 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.

- [NHS Counter Fraud Agency](#) for concerns about fraud and corruption, using their [online reporting form](#) or calling their freephone line **0800 028 4060**.
- If you would like to speak up externally about the conduct of a registered member of staff, you can do this by contacting the relevant professional body such as the General Medical Council, Nursing and Midwifery Council, Health & Care Professions Council, General Dental Council, General Optical Council or General Pharmaceutical Council.

Appendix A contains information about making a 'protected disclosure'.

2.6. 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).

Appendix B shows a flow diagram of how to raise a concern.

Confidentiality
The most important aspect of 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.

2.7. Advice and Support

Any of the contacts listed above can provide advice and support.

There are also details about local support available to you within the Trust such as Occupational Health and staff counselling, staff wellness, personal resilience at [Occupational Health and Wellbeing - Home](#) Information about bullying and harassment and local Bullying and Harassment Advisors is available at [Bullying and Harassment](#).

Our [staff networks](#) can be a valuable source of peer support and signposting.

If you are a member of a trade union, they may also provide support and advice.

Our Freedom to speak up guardians who can support you to speak up if you feel unable to do so by other routes. The guardian 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.

You can access a range of health and wellbeing support via NHS England:

- [Support available for our NHS people](#).
- NHS England has a [Speak Up Support Scheme](#) that you can apply to for support.
- Internal wellbeing support can be accessed [Occupational Health and Wellbeing - Home](#)
- CiC is an independent, free and confidential advice service for all new employees of HDFT and their families. This new and enhanced service has been commissioned to support and improve the wellbeing and psychological health of our people. Whether you're after practical advice or emotional support with either work or personal issues, CiC can offer expert guidance. CiC offers assistance in multiple ways, including 24/7 around the clock support for work/life issues via email, live chat or free phone number. They provide structured therapy, dedicated managerial advice as well as legal and financial advice to you and your immediate family. [CiC - Employee Assistance Programme](#)

You can also contact the following organisations:

- [Speak Up Direct](#) provides free, independent, confidential advice on the speaking up process.
- The charity [Protect](#) (previously known as Public Concern at Work) provides confidential and legal advice on speaking up.
- The [Trade Unions 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.

2.8. What will we do?

On receipt, your concern will be recorded and you will normally receive an acknowledgement within 5 working days. The confidential central record will record the date the concern was received, whether you have requested confidentiality, a summary of the concerns and the dates we have given you updates or feedback.

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 employment policy or process or patient safety incident process, this policy ensures that the matter is still addressed.

What you can expect to happen after speaking up is shown in Appendix C.

2.9. Resolution and investigation

The Freedom to Speak Up Guardian supports 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, the Associate Director of Quality & Corporate Affairs will work with the FTSU Guardian to ensure that the proper levels of scrutiny are met. The investigation will be objective and conducted by someone who is suitably independent (this might be someone outside our organisation or from a different part of the organisation) and trained in investigations. It will reach a conclusion within a reasonable timescale (which we will notify you of), and a summary report will be produced that identifies any issues/lessons learned to prevent problems recurring.

Any employment issues that have implications for staff capability or conduct identified during the investigation will be considered separately in line with the appropriate procedure.

The manager's template can be found at Appendix D.

2.10. 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 as much information as possible whilst respecting the confidentiality of others and recognising that some matters may be strictly confidential.

2.11. How we learn from your speaking up

We want speaking up to improve the services we provide for patients and the environment our staff work in. Where it identifies improvements that can be made, we 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.

2.12. Review

We will seek feedback from colleagues about their experiences of speaking up. We will review the effectiveness of this policy and our local process in line with our Policy on Policies.

2.13. Senior Leaders Oversight

We will ensure that regular meetings are held between our FTSU Guardian and our Chair and Chief Executive. Professional supervision will be provided by the Executive Director of Nursing, Midwifery and AHPs supported by the Associate Director of Quality and Corporate Affairs. A quarterly report will be discussed at our People & Culture Committee (sub-Committee of the Trust Board) with the report also provided to the Trust Board.

3. ROLES AND RESPONSIBILITIES

Executive Leadership Team

To oversee this policy and ensure it has been developed according to agreed national and trust procedures.

To ensure that appropriate mechanisms are in place to enable individuals to raise their concerns. It must also ensure that these concerns are taken seriously and dealt with confidentially, within reasonable time limits and in the most appropriate way.

Executive Director for Nursing, Midwifery and Allied Health Professionals

To act as lead director and Designated Senior Manager under this policy.

Associate Director of Quality and Corporate Affairs (Company Secretary)

To ensure this policy is monitored as required and reviewed on a 3 yearly basis or sooner if there are national or legal requirements.

Non- executive responsible for Freedom to speak up

To act as the designated "Senior Independent Director" to ensure that the HDFT adheres to accepted standards of behaviour in public life, including probity and integrity. Should any conflict of interest occur due to this dual role this will be addressed on a case by case basis in liaison with the

Freedom to Speak Up Guardians

- To support the trust to continually build a healthy and just culture where staff feel safe and confident to raise concerns at work.
- To provide confidential advice and support to staff in how to raise their concerns about staff and service user safety and/or the way their concerns were handled.
- To identify and report broad areas of concern with the Chief Executive, Executive Management Team and Trust Board via the lead Guardian.
- The Trust is committed to the Freedom to Speak Up Guardian role and will periodically review its implementation.

Managers

- To be aware of this policy and how to deal with concerns raised (including concerns regarding fraud, corruption and bribery) in a timely manner.
- To ensure appropriate action is taken to consider and resolve the concern and to clearly document all action taken to address the concern and the solutions reached.
- To ensure that no member of staff is subject to a detriment for raising a concern.
- To encourage open discussion around concerns as part of everyday business.

Members of staff and others

- To understand the importance of raising concerns.
- To raise honest and genuine concerns about any risk, malpractice or wrong doing in accordance with this policy.
- Contractors or employees of contractors may contact the Chief Executive or Head

of Health & Safety.

Trade Unions

- To support the implementation of this policy, provide advice and encourage their members to raise concerns through this policy.
- To support and represent their members through any formal processes.

4. POLICY DEVELOPMENT AND EQUALITY

Trade Union representatives along with management representatives who are members of the Policy Advisory Group (PAG) have been involved in the development of this policy.

- This policy has undergone Stage 1 Equality Impact Assessment screening
- This policy does not require a full Stage 2 Equality Impact Assessment screening.

The Trust is committed to creating a culture that fully respects equality and diversity and aims to ensure that all its services are accessible, appropriate and sensitive to the needs of the whole community. It believes in fairness, equity and above all values diversity in all its dealings, both as a provider of health services and an employer of people.

This policy has been developed to reinforce the Trust's vision in this respect and to give direction for the pursuit of the highest standards of equality and diversity in all our services. This policy reflects the following:

- opportunities for employment, promotion, training and development are open to all on an equal basis.
- access to services is sensitive to individual needs irrespective of colour, disability, ethnic origin, age, gender, illness (such as HIV/AIDs), marital status, nationality, race, religion, sexual orientation and social background;
- all future service developments take into account the needs of all groups within the community.
- patients, staff, volunteers and all other service users and providers are treated with dignity and respect.
- every colleague has a role to play in recognising and respecting equality and diversity in others.
- staff are able to carry out their duties effectively without fear of discrimination, harassment or bullying of any kind.
- The Trust will continue to embed its equality and diversity values into all of its policies, procedures and everyday practice, so that equality and diversity is the

norm.

5. CONSULTATION, APPROVAL AND RATIFICATION PROCESS

The Policy Advisory Group which is a subgroup of the Partnership Forum is composed of management and Trade Union representatives and considers all draft HR policies and guidance. All members have the opportunity to make comments and suggestions on the document content which is debated within the group and amendments made and agreed.

Any additional individuals or groups that are relevant to include in the consultation process will be identified in Appendix E.

This policy will be approved at the Partnership Forum (the formally constituted management and staff consultation committee which is made up of Trade Union representatives from all the recognised Trades Union and Staff Association and Trust Directors and the Chief Executive (or their representatives)) and at the Senior Management Team/Strategy Deployment Room meeting.

6. DOCUMENT CONTROL

The policy will be published in the Trustwide policy store: PolicyStat

Where the policy replaces a previous version, the old policy will be archived as evidence of a previous policy. The front page of the policy will indicate the version number, the approving body and date of approval along with the next review date.

The policy should be accessed from the electronic document library. Copies of this document should not be printed unless it is absolutely necessary as there is a risk that out of date copies may be in circulation. Requests for this policy in an alternative language or format (such as Braille, audiotape, large print etc) will be considered and obtained whenever possible.

7. DISSEMINATION AND IMPLEMENTATION

Senior Managers will have responsibility for ensuring that their staff are aware of current policy. The policy will be sent to all members of HR and discussed at the team meeting to ensure all members are fully aware of any changes to the policy.

Once a new version of the policy has been approved, loaded to the intranet and senior managers and the HR team have been informed any new cases will be handled in accordance with the new policy. Any cases already in progress will continue to use the previous version of the policy current at the time the case began, unless there is agreement from all parties to follow the new policy.

Any relevant training or advice in relation to the implementation of the policy will be specified and provided by the HR team where appropriate.

8. MONITORING COMPLIANCE AND EFFECTIVENESS

The Trust will take account of bullying and harassment cases reported via the Bullying and Harassment Advisors and to the HR team and also levels of bullying and harassment reported via the NHS staff survey. The Trust will look for and compare trends over a period of several years to take into account changes in reporting levels.

The key performance indicators for this policy are:

- The number and type of concerns raised to the Freedom to Speak Up Guardians.
- The outcome of cases raised to the Freedom to Speak Up Guardians and staff feedback on the process of speaking up.

The key performance indicators will be monitored using the database for recording concerns raised. This is summarised in Appendix F. The results of monitoring will be set out in a report from the Freedom to Speak Up Guardians to the Board of Directors every 6 months. This will also be shared with the directorates, HR, and the Board of Directors.

9. REFERENCE DOCUMENTS

- *Public Interest Disclosure Act 1998*
- *Human Rights Act 1998*
- *Enterprise and Regulatory Reform Act 2013*
- *Speaking up for a Healthy NHS, commissioned by the Social Partnership Forum*
- *NHS Constitution*
- *Sir Robert Francis QC (2015) Freedom to Speak Up: an independent report into creating an open and honest reporting culture in the NHS.*
- *National Guardians Office Case Reviews*

- *NHS Improvement and NHS England: Freedom to speak up: raising concerns (whistleblowing) policy for the NHS*

10. ASSOCIATED DOCUMENTATION

- [Anti Fraud, Bribery and Corruption Policy](#)
- [Duty of Candour and Being Open Policy](#)
- [Safety Event Policy](#)
- [Grievance Resolution Policy & Procedure](#)
- [Bullying and Harassment Policy](#)
- [Information Governance and Information Security Policy](#)

If the concern raised involves the conduct, performance or health of an employee, action taken under this policy and procedure may result in action being pursued under the following:

- [Disciplinary Policy](#)
- [Capability Policy](#)
- [Sickness Absence and Support Policy](#)
- [Disciplinary, Capability, Ill Health and Appeals Policy and Procedure for Doctors and Dentists](#)

11. APPENDICES

- Appendix A: Protected Disclosure
- Appendix B: How to raise a concern
- Appendix C: What to expect when speaking up
- Appendix D: Manager's Template
- Appendix E: Consultation Summary
- Appendix F: Key Performance Indicators

Appendix A: Protected Disclosure

Making a 'protected disclosure'

A protected disclosure is defined in the Public Interest Disclosure Act 1998. This legislation allows certain categories of worker to lodge a claim for compensation with an employment tribunal if they suffer as a result of speaking up. The legislation is complex and to qualify for protection under it, very specific criteria must be met in relation to who

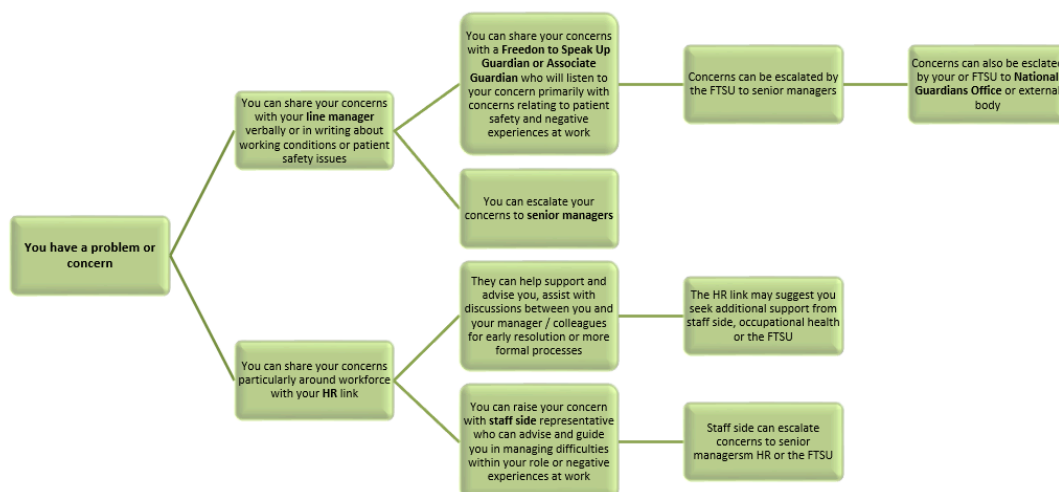
is speaking up, about what and to whom. To help you consider whether you might meet these criteria, please seek independent advice from the [Protect](#) or a legal representative.

A protected disclosure is defined in the Public Interest Disclosure Act 1998 (PIDA). This legislation allows certain categories of worker to lodge a claim for compensation with an employment tribunal if they suffer as a result of speaking up. The legislation is complex and to qualify for protection under it, very specific criteria must be met in relation to who is speaking up, about what and to whom.

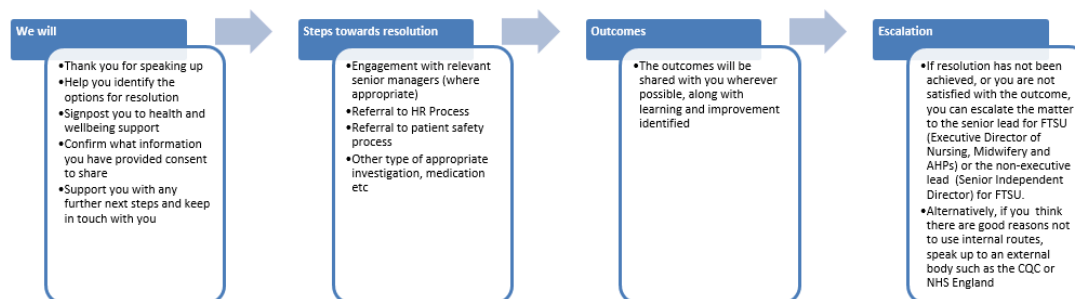
In order to qualify for protection under PIDA, you must make a protected disclosure. This has three main elements to it:

1. You must provide information of a concern that you "reasonably believe" shows a category of wrongdoing set out in the law i.e.
 - i. A criminal offence, for example fraud
 - ii. Someone's health and safety is in danger
 - iii. Risk or actual damage to the environment
 - iv. A miscarriage of justice
 - v. Failure to comply with a legal obligation
 - vi. You believe someone is covering up wrongdoing
2. You must reasonably believe that the concern is in the public interest
3. You must raise your concern in accordance with the law – either internally to your employer or externally to an outside body

Appendix B: How to Raise a Concern



Appendix C: What you can expect when raising a concern



Appendix D: Managers Template

Confidential HDFT Manager / Colleague Discussion Template for Speaking Up (Part A)

If a colleague is speaking up to you as their manager please complete the following form and submit to the
Freedom to Speak Up Guardian within 5 working days of the discussion.

Ref Number:	Date Sent:
Directorate:	
Department:	
Name of Line Manager:	
Overview of Concern:	
Does the colleague speaking up wish to remain anonymous?	
Yes No	
Response Category:	
Level 1: Immediate Level 2: Urgent Level 3: Standard	
Planned Action: Please outline how you plan to respond to the matters spoken up about.	

If you have any questions about this or any other FTSU related issue please contact:
hdft.freedomto.speakup@nhs.net

Guide for Managers on Level and Response Category:

Level	Response Category	Examples	Timescales for Managers to confirm next steps	Timescales for Managers to conclude review
1	Immediate	Safeguarding issue, patient physically or verbally assaulted / abused by a colleague	2 working days	30 working days
2	Urgent	Concerns around quality of care / service. Patient Safety	3 working days	40 working days

		Staff Safety		
3	Standard	Culture of Bullying Fraud Disagreement	5 working days	60 working days



HDFT Managers Template for Learning from Speaking Up (Part B)

Following a colleague speaking up, please complete the following template once your investigations have been completed.

The information you give in this document is to help support HDFT in learning and improving. The information should be anonymised.

This should be completed and sent back to the Freedom to Speak Up Guardian within 10 working days of you completing your investigation.

Ref Number: As per your initial discussion document
A brief summary of the initial speaking up:
What learning has been identified as a result of the investigation:
What actions have been taken to make improvements / embed learning:
Have you identified any learning that you think is transferrable to other teams:

What information has been feedback to the colleague speaking up:

Appendix E: Consultation Summary

<p>Those listed opposite have been consulted and any comments/actions incorporated as appropriate.</p> <p>The author must ensure that relevant individuals/groups have been involved in consultation as required prior to this document being submitted for approval.</p>	List Groups and/or Individuals Consulted
	HR Team
	Partnership Forum
	Policy Advisory Group
	Senior Independent Director
	Guardian of Safe Working Hours
	Local Counter Fraud Specialist
	Executive Director of Nursing, Midwifery and AHPs
	Associate Director of Quality and Corporate Affairs
	Director of People and Culture
	Senior Management Team
	Associate Freedom to Speak Up Guardians
	Fairness Champions

Appendix F: Key Performance Indicators

KPIs	Audit / Monitoring	Audit / Monitoring	Audit / Monitoring	Audit / Monitoring	Concerns with results

	required	performed by	frequency	reported to	escalated to
To monitor the number and types of concerns raised	How many concerns are raised and what issues are involved?	FTSU Guardians	6 monthly	Board of Directors	Chief Executive or Senior Independent Director
To monitor the outcome of cases and staff feedback on the process of speaking up	What is the outcome of the cases and staff experience of speaking up?	FTSU Guardians	6 monthly	Board of Directors	Chief Executive or Senior Independent Director

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Approval Signatures

Step Description	Approver	Date
Senior Management Team	SMT Senior Management Team [RH]	16 Jun, 2025
Partnership Forum	Steven Tovey: Human Resources Business Partner	11 Jun, 2025
Policy Advisory Group	Alison Crabbe: HR Officer	10 Jun, 2025
Policy Governance Team Review	Policy Governance Team Review PGTR [PC]	10 Jun, 2025
Policy Governance Team Review	PGT Policy Governance Team [KK]	10 Jun, 2025
Policy Owner	Rachel Hewson: Administrative Assistant	10 Jun, 2025