

<b>Corporate</b>	<b>NENC ICB HR 13 – Freedom to Speak Up Policy</b>
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<b>Version Number</b>	<b>Date Issued</b>	<b>Review Date</b>
1	9 <sup>th</sup> May 23	March 2024

<b>Prepared By:</b>	Kate Holliday, Quality Improvement Manager & Freedom to Speak up Guardian
<b>Consultation Process:</b>	Workforce One Freedom to Speak Up Guardian Counter Fraud Trade Union Partnership Forum
<b>Formally Approved:</b>	9 <sup>th</sup> May 23
<b>Approved By:</b>	Executive Committee

## **EQUALITY IMPACT ASSESSMENT**

<b>Date</b>	<b>Issues</b>
28 March 2023	This policy is not currently available in alternative formats

## **POLICY VALIDITY STATEMENT**

Policy users should ensure that they are consulting the currently valid version of the documentation. The policy will remain valid, including during its period of review. However, the policy must be reviewed at least once in every 3-year period.

## **ACCESSIBLE INFORMATION STANDARDS**

If you require this document in an alternative format, such as easy read, large text, braille or an alternative language please contact [necsu.icbhr@nhs.net](mailto:necsu.icbhr@nhs.net).

## Version Control

Version	Release Date	Author	Update comments
1	9 <sup>th</sup> May 23	Kate Holliday, Quality Improvement Manager & Freedom to Speak up Guardian	This policy replaces HR35 Freedom to Speak Up: Raising Concerns (Whistleblowing) Policy

## Approval

Role	Name	Date
Executive Committee	Executive Committee	9 <sup>th</sup> May 23

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# 1. Introduction

## Speak Up we will listen

NENC ICB (the Organisation) 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.

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”.

The Organisation 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 or student. We also know that workers with disabilities, or from a minority ethnic background or the LGBTQ+ community do not always feel able to Speak Up.

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

### 1.1 Status

This policy is a People policy.

### 1.2 Purpose and scope

This policy applies to all of our employees.

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

All NHS organisations and others providing NHS healthcare 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 patients and workers. Its aim is to ensure all matters raised are captured and considered appropriately.

## 2. Definitions

All definitions are clarified throughout this policy.

### Roles and Responsibilities

#### Executive Directors and Chief Executive

- Support the implementation of this Policy by modelling appropriate behaviours.
- All directors and managers are responsible for ensuring that relevant staff within their own directorates and departments have read and understood this document and are competent to carry out their duties in accordance with the procedures described.
- The Executive Team/Committee is accountable for ensuring compliance with this policy and consistency in its application.

#### Freedom to Speak Up 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.
- Can support employees to Speak Up if they feel unable to do so by other routes.

#### Senior Executive lead responsible for Freedom to Speak Up

- Provide senior support for our Speaking-Up guardian and are responsible for reviewing the effectiveness of our FTSU arrangements.

#### Non-executive director responsible for Freedom to Speak Up

- provides more independent support for the guardian.
- offers a fresh pair of eyes to ensure that investigations are conducted with rigor.
- helps escalate issues when appropriate.

#### Human Resources

- Will provide support, advice and guidance on any aspect of this policy to both managers and new employees to ensure a consistent and fair approach within the Organisation.

#### Relevant Employees

- Have a responsibility to report concerns that they may have.

### **3. Speaking Up Process**

#### **What can I Speak Up about**

You can Speak Up about anything that gets in the way of patient 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;
- 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.

The ICB particularly encourages employees to Speak Up about:

- unsafe patient care
- unsafe working conditions
- inadequate induction or training.
- lack of, or poor, response to a reported patient safety incident
- suspicions of fraud (which can also be reported to local counter fraud team)
- a bullying culture (across the team or organisation rather than individual instances of bullying )

Speaking Up, therefore, captures a range of issues, some of which may be appropriate for other existing processes (for example, HR or patient safety/quality) as detailed in section 6 of this policy. As an Organisation, we will listen and work with you to identify the most appropriate way of responding to the issue you raise.

Concerns relating to an individual's employment that affects only themselves and not others should be referred to the Organisation's Grievance Policy.

If a concern relates to safeguarding, the Organisation's policy for managing such allegations will be followed. Where the concern raised is solely about safeguarding, it will be recorded, but the appropriate safeguarding process will supersede the Freedom to Speak Up Policy.

#### **We want you to feel safe to Speak Up**

Your Speaking Up to us is a gift 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 who works for the Organisation.

Freedom to Speak Up encompasses any current or former employees, trainees, volunteers and NHS healthcare professionals, including pharmacy, optometry, dentistry 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, for example;

- Senior managers or directors with responsibility for the subject matter you are Speaking Up about.
- Patient safety or clinical governance colleagues (where concerns relate to patient safety or wider quality)
- Local counter fraud team (where concerns relate to fraud)
- Our Freedom to Speak Up Guardians; Kate Holliday or Jane Hall, 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 find out more about the guardian role [here](#).
- Our senior lead responsible for Freedom to Speak Up David Purdue, Executive Chief Nurse
- Our non-executive director responsible for Freedom to Speak Up, David Stout.
- Our HR team

Further contact details are listed in Appendix 1.

Any matter raised under this procedure will be investigated thoroughly and promptly and the outcome of the investigation reported back to the employee or other worker who raised the issue.

## Speaking Up externally

If you do not want to Speak Up to someone within the Organisation, 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 regarding:

- 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

<https://www.england.nhs.uk/ourwork/freedom-to-speak-up/how-to-speak-up-to-us-about-other-nhs-organisations/>

NHS England may decide to investigate the concern themselves, ask your employer or another appropriate organisation to investigate (usually with their oversight) and / or use the information that you provide to them to inform their oversight of the relevant organisation. The precise action they take will depend on the nature of the 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 Authority](#) 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 about the conduct of a 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 B contains information about making a 'protected disclosure'.

Some professionals are obliged to make reports by their regulators.

## How should I Speak Up?

You can Speak Up to any of the people or organisations listed either in person, by phone or in writing (including email).



## Confidentiality

The most important aspect of your 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.

## 4. Advice and Support

Support is available internally and externally and are either detailed below or in Appendix 1. In addition, the Organisation will develop staff networks which can be a valuable source of support.

### NENC Staff Wellbeing hub

The Wellbeing Hub is open to anyone who works in health or social care in the North-East or North Cumbria. It is free, easy to access and highly confidential source of support in these challenging times. The staff wellbeing hub offers support, signposting and therapy.

<https://northeastnorthcumbria.nhs.uk/staff-wellbeing-hub/>

or call between 9.30am and 5pm on **0191 223 2030**

## Health and wellbeing support via NHS England:

- [Support available for our NHS people.](#)
- [Looking after you: confidential coaching and support for the primary care workforce.](#)

NHS England has a [Speak Up Support Scheme](#) that you can apply to for support.

You can also contact the following organisations:

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

While the helpline cannot investigate concerns, it can provide invaluable advice on whether your concern is indeed whistleblowing and talk you through the process to ensure it is followed correctly. The helpline is also able to advise on how you can escalate the concern with a prescribed body if needed.

Telephone: 08000 724 725.

Web: [www.speakup.direct/contact-us/](http://www.speakup.direct/contact-us/)

- The charity [Protect](#) provides confidential and legal advice on Speaking Up.

Protect, formerly Public Concern at Work, is a charity that provides free, confidential legal advice to people who are concerned about wrongdoing at work and not sure whether, or how, to raise their concern.

Telephone: 020 3117 2520

Web: [protect-advice.org.uk](http://protect-advice.org.uk)

Email: [england.voicingyourconcerns@nhs.net](mailto:england.voicingyourconcerns@nhs.net)

Free, independent and confidential advice from the Whistleblowing Helpline for NHS and Social Care on 08000 724725.

- 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 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 2.

## **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 your 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 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 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 employees to our FTSU guardian(s).

## 5. Training Implications

All training will be assigned to individuals based on their job role and accessed through ESR. All employees are asked to complete the online training on Speaking Up.

<https://www.e-lfh.org.uk/programmes/freedom-to-speak-up/>

The online module on Listening Up is specifically for managers to complete.

The online module on Following Up is for senior leaders to complete.

## 6. Documentation

### 6.1 Other related policy documents.

ICBP043 Safeguarding Children Policy

ICBP043 Safeguarding Adults Policy

ICBP029 Standards of Business Conduct and Declarations of Interest Policy

HR40 Managing Allegations Against Staff Policy

HR07 Disciplinary Policy

HR11 Grievance and Disputes Procedures.

ICBP009 Counter Fraud Bribery and Corruption Policy

### 6.2 Legislation and statutory requirements

- Public Interest Disclosure Act 1998 (PIDA)
- Enterprise and Regulatory Reform Act 2013
- Equality Act 2010
- Bribery Act 2010
- Fraud Act 2006
- NHS Constitution

### 6.3 Best practice recommendations

Role of a Freedom to Speak Up Guardian

<https://nationalguardian.org.uk/for-guardians/job-description/>

Freedom to Speak Up Policy for NHS England

<https://www.england.nhs.uk/publication/the-national-speak-up-policy/>

NHS People Promise

<https://www.england.nhs.uk/ournhspeople/online-version/lfaop/our-nhs-people-promise/the-promise/#we-each-have-a-voice-that-counts>

Blowing the whistle: List of prescribed people and bodies, Government Guidance 24 November 2016

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

Sir Robert Francis QC (2015) *Freedom to Speak Up: an independent report into creating an open and honest reporting culture in the NHS*

<https://www.gov.uk/government/publications/sir-robert-francis-freedom-to-speak-up-review>

## 7. Monitoring, Review and Archiving

### 7.1 Monitoring

The Board will agree with the Executive Chief Nurse a method for monitoring the dissemination and implementation of this policy. Monitoring information will be recorded in the policy database.

### 7.2 Review

7.2.1 The Board will ensure that this policy document is reviewed in accordance with the timescale specified at the time of approval. **No policy or procedure will remain operational for a period exceeding three years without a review taking place.**

7.2.2 Staff who become aware of any change which may affect a policy should advise their line manager as soon as possible. The Sponsoring Director (or nominated deputy) will then consider the need to review the policy or procedure outside of the agreed timescale for revision.

7.2.3 For ease of reference for reviewers or approval bodies, changes should be noted in the 'document history' table on the front page of this document.

**NB:** If the review consists of a change to an appendix or procedure document, approval may be given by the sponsoring director and a revised document may be issued. Review to the main body of the policy must always follow the original approval process.

### Equality and Inclusion

NENC ICB HR policies and practice embrace the values of the NHS including the NHS People Plan and People Promise, including 'more staff, working differently within a compassionate and inclusive culture'.

NENC ICB has committed to being 'the best at getting better' and some of its key priorities are to our people, to reduce inequality and to be the best place to work and train. Our people policies are developed in this ethos for our current and future staff.

Our policies will be written in plain English, whenever possible, acknowledging that references to legal processes and the associated language may sometimes make this challenging.

To ensure that they are accessible to all our current and future staff, we will work with our staff and their representatives to establish where other formats may be helpful.

### 7.3 Archiving

The Board will ensure that archived copies of superseded policy documents are retained in accordance with Records Management: NHS Code of Practice 2021.

# Appendix 1 Contact Details for Speaking Up

## NENC ICB Internal

### Senior Leaders

A Senior manager, or director with responsibility for the subject matter you are Speaking Up about.

The Chair, Chief Executive and all of our Executive leadership team and Non-Executive Directors are listed on our website

<https://northeastnorthcumbria.nhs.uk/about-us/our-team/>

### Our Freedom to Speak Up Guardians

Name:	Kate Holliday
Telephone:	07920 504 668
Email:	<a href="mailto:k.holliday@nhs.net">k.holliday@nhs.net</a>
Name:	Jane Hall
Telephone:	07500 854 798
Email:	<a href="mailto:jane.hall31@nhs.net">jane.hall31@nhs.net</a>

There is also an option to contact the FTSU Guardians anonymously

Email:	<a href="mailto:cuccg.northcumbriaccg-fts@nhs.net">cuccg.northcumbriaccg-fts@nhs.net</a>
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### NENC ICBs Freedom to Speak Up Executive Lead

Name:	David Purdue - Executive Chief Nurse
Address:	NENC ICB, Pemberton House, Colima Avenue, Sunderland SR5 3XB
Telephone:	0191 512 8484
Email:	<a href="mailto:David.Purdue@nhs.net">David.Purdue@nhs.net</a>

### Our non-executive director responsible for Freedom to Speak Up

Name:	David Stout – Non-Executive Member for Audit
Address:	NENC ICB, Pemberton House, Colima Avenue, Sunderland SR5 3XB
Telephone:	0191 512 8484
Email:	<a href="mailto:d.stout@nhs.net">d.stout@nhs.net</a>

**Local counter fraud team (where concerns relate to fraud)**

Name:	NHS Counter Fraud Authority – Audit One
Address:	<a href="https://cfa.nhs.uk/">https://cfa.nhs.uk/</a> counterfraud@auditone.co.uk
Telephone:	0191 441 5936

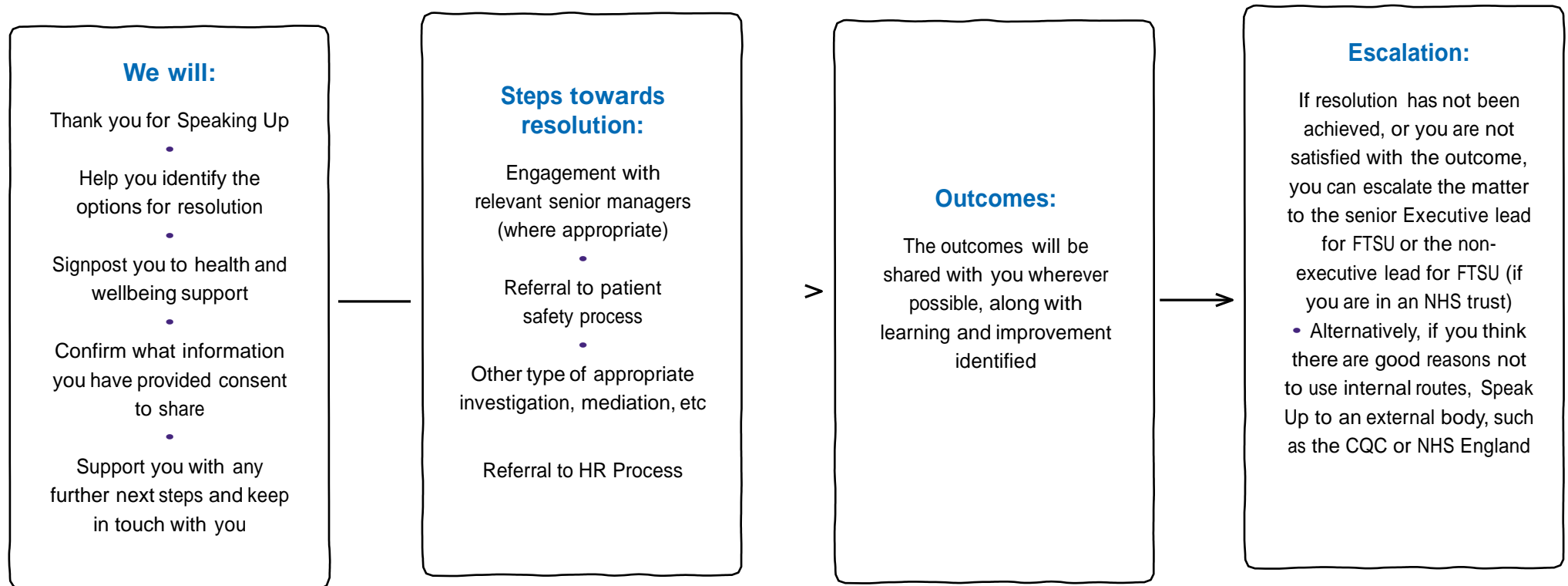
## External Contacts

Organisation	Concerns relating to:	Contact Details
Care Quality Commission	<ul style="list-style-type: none"> <li>Quality and safety of health and social care provision</li> </ul>	CQC National Customer Service Centre Citygate Gallowgate Newcastle upon Tyne NE1 4PA Tel: 03000 616161 <a href="http://www.cqc.org.uk">www.cqc.org.uk</a>
NHS England & NHS Improvement	<ul style="list-style-type: none"> <li>Primary medical services (general practice).</li> <li>Primary dental services.</li> <li>Primary ophthalmic services.</li> <li>Local pharmaceutical services</li> <li>How NHS trusts and foundation trusts are run</li> <li>Other providers with an NHS provider licence</li> <li>NHS procurement, choice and competition</li> <li>The national tariff</li> </ul>	NHS England PO Box 16738 Redditch B97 9PT  Tel: 0300 311 22 33 Email: <a href="mailto:england.contactus@nhs.net">england.contactus@nhs.net</a> <a href="http://www.england.nhs.uk">www.england.nhs.uk</a>
Health Education England	<ul style="list-style-type: none"> <li>Education and training in the NHS.</li> </ul>	Health Education England 1st Floor Blenheim House Duncombe Street Leeds LS1 4PL <a href="mailto:Hee.enquiries@nhs.net">Hee.enquiries@nhs.net</a>
Health & Safety Executive	<ul style="list-style-type: none"> <li>Health and safety law and minimum standards</li> </ul>	<a href="http://www.hse.gov.uk/contact/concerns.htm">www.hse.gov.uk/contact/concerns.htm</a>



# Appendix 2:

## What will happen when I Speak Up?



## Appendix 3

# 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.

## Appendix 4 Template Speaking Up Form



### SPEAKING UP (RAISING CONCERNS) FORM

#### Section 1 – Expressed Preferences

Do you wish your identity to be kept confidential (bearing in mind that, depending on the nature of the concern / investigation, it may become necessary to disclose your identity)?

YES/ NO

If you wish to remain anonymous, please go straight to Section 3. However please note that whilst such concerns will be given due consideration, this may make it more difficult to investigate and provide assurance on.

#### Section 2 – Details of the Person Raising the Concern

Name .....

Address .....

.....

.....

Contact Number

.....

Department

.....

Work Contact No

.....

Do you wish correspondence / contact to be made to Home / Work (delete as appropriate)

Date disclosure form submitted

.....

**Section 3 – Details of the Disclosure (please tick)**

- Unsafe Patient care / clinical practice
- Unsafe working conditions
- Danger to Health and Safety
- Suspicions of Fraud and corruption (can be reported to the Local Counter Fraud Specialist)
- Negligence
- Other (please state)

.....

This form does not cover personal complaints regarding an individual's employment situation. This would constitute an individual grievance and should be dealt with under the Organisation's Grievance Policy which is available on the intranet.

What is the concern about? (Please give full details – it would help if you could supply dates/times/witnesses)

Please describe what has happened / what you think will happen. Please provide as much detail as you can (use additional sheets as needed)

What do you think for you would be a good outcome of raising this concern?

Have you raised / attempted to raise this concern with anyone before YES / NO

If yes to above, who did you raise it with?

.....

## Section 4 – Personal involvement / personal interest

Please declare any personal interest you may have in this concern (i.e. does the outcome have the potential to affect you personally in any way?)

Have you personally been involved in this matter previously? YES / NO

If yes, please outline your involvement

On completion please send this to the most appropriate person

- Your line manager
- Your manager's manager
- Freedom to Speak Up (FTSU) Guardian – email details below

Name:	Kate Holliday
Telephone:	07920 504 668
Email:	<a href="mailto:k.holliday@nhs.net">k.holliday@nhs.net</a>
Name:	Jane Hall
Telephone:	07500 854 798
Email:	<a href="mailto:jane.hall31@nhs.net">jane.hall31@nhs.net</a>

### Office Use Only

Date Received ..... Ref No .....

Date Resolved .....

Resolution – including and learning

Update provided to staff member including date provided

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## Appendix 5 – Equality Impact Assessment Initial Screening Assessment (STEP 1)

As a public body organisation we need to ensure that all our current and proposed strategies, policies, services and functions, have given proper consideration to equality, diversity and inclusion, do not aid barriers to access or generate discrimination against any protected groups under the Equality Act 2010 (Age, Disability, Gender Reassignment, Pregnancy and Maternity, Race, Religion/Belief, Sex, Sexual Orientation, Marriage and Civil Partnership).

This screening determines relevance for all new and revised strategies, policies, projects, service reviews and functions.

Completed at the earliest opportunity it will help to determine:

- The relevance of proposals and decisions to equality, diversity, cohesion and integration.
- Whether or not equality and diversity is being/has already been considered for due regard to the Equality Act 2010 and the Public Sector Equality Duty (PSED).
- Whether or not it is necessary to carry out a full Equality Impact Assessment.

### Name(s) and role(s) of person completing this assessment:

**Name:** Sarah Kilner  
**Job Title:** Workforce Lead  
**Organisation:** NENC ICB

**Title of the service/project or policy:** Freedom to Speak Up Policy

### Is this a;

**Strategy / Policy**       **Service Review**       **Project**   
**Other**

### What are the aim(s) and objectives of the service, project or policy:

All NHS organisations and others providing NHS healthcare 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 patients and workers. Its aim is to ensure all matters raised are captured and considered appropriately.

### Who will the project/service /policy / decision impact?

(Consider the actual and potential impact)

- **Staff**
- **Service User / Patients**
- **Other Public Sector Organisations**
- **Voluntary / Community groups / Trade Unions**
- **Others, please specify** [Click here to enter text.](#)

Questions	Yes	No
Could there be an existing or potential negative impact on any of the protected characteristic groups?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Has there been or likely to be any staff/patient/public concerns?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Could this piece of work affect how our services, commissioning or procurement activities are organised, provided, located and by whom?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Could this piece of work affect the workforce or employment practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Does the piece of work involve or have a negative impact on: <ul style="list-style-type: none"> <li>• Eliminating unlawful discrimination, victimisation and harassment</li> <li>• Advancing quality of opportunity</li> <li>• Fostering good relations between protected and non-protected groups in either the workforce or community</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**If you have answered no to the above and conclude that there will not be a detrimental impact on any equality group caused by the proposed policy/project/service change, please state how you have reached that conclusion below:**

All People policies will affect workforce or employment practices and are developed in consideration of equality diversity and inclusion to minimise negative impact. This policy has no positive or negative impact specific to protected characteristics and as such is justified as a neutral impact.

**If you have answered yes to any of the above, please now complete the ‘STEP 2 Equality Impact Assessment’ document**

<b>Accessible Information Standard</b>	<b>Yes</b>	<b>No</b>
Please acknowledge you have considered the requirements of the Accessible Information Standard when communicating with staff and patients.  <a href="https://www.england.nhs.uk/wp-content/uploads/2017/10/accessible-info-standard-overview-2017-18.pdf">https://www.england.nhs.uk/wp-content/uploads/2017/10/accessible-info-standard-overview-2017-18.pdf</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Please provide the following caveat at the start of any written documentation:  <b>“If you require this document in an alternative format such as easy read, large text, braille or an alternative language please contact (ENTER CONTACT DETAILS HERE)”</b>  People policies also state that they will be written in plain English, whenever possible, acknowledging that references to legal processes and the associated language may sometimes make this challenging.  To ensure that they are accessible to all our current and future staff, we will work with our staff and their representatives to establish where other formats may be helpful.		
<b>If any of the above have not been implemented, please state the reason:</b>  Click here to enter text.		

## **Governance, ownership and approval**

Please state here who has approved the actions and outcomes of the screening
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Name	Job title	Date
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## Publishing

This screening document will act as evidence that due regard to the Equality Act 2010 and the Public Sector Equality Duty (PSED) has been given.

If you are not completing 'STEP 2 - Equality Impact Assessment' this screening document will need to be approved and published alongside your documentation.

**Please send a copy of this screening documentation to:  
NECSU.Equality@nhs.net for audit purposes.**