



Raising and Escalating Concerns in a Placement Policy and Procedure



Scope:

All programmes regulated by Professional Statutory and Regulatory Bodies with a placement aspect taught by City, University of London.

Senate Regulations: N/A

Date approved/re-approved: TBC

Approved by Board of Studies: 13 February 2024

Date for review:

To be reviewed on a periodic basis, with allowance for minor annual updates by Practice Education Committee and approval by Board of Studies, as required.

Effective from: February 2024

Associated Regulations/Policies:

Fitness to Practise
(Train)
Reflection and
Development Plan
(RAD)

Equality and Diversity Statement

City, University of London is committed to promoting equality, diversity and inclusion in all its activities, processes, and culture, under its Public Sector Equality Duties and the Equality Act 2010. This includes promoting equality and diversity for all, irrespective of any protected characteristic, working pattern, family circumstance, socio-economic background, political belief or other irrelevant distinction.

Where relevant to the policy, decision-making panels will ensure a reasonable gender balance (with at least one man and one woman) and will actively consider representation of other protected group.

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Context

1. This policy is intended to ensure incidents or concerns on placement are dealt with fairly, consistently, effectively and in a timely manner, in accordance with the School's, Professional Statutory Regulatory Bodies (PSRB), NHS England Workforce Training and Education NHSE WTE requirements and regulations.
2. The policy outlines the process to be followed when a student is involved with or observes unsafe or unprofessional practice when in a placement.
3. This policy is designed to provide guidance and support for students, academic and practice staff in raising and escalating concerns in a placement, and reporting incidents of unsafe or unprofessional practice when in a placement.
4. Patient safety is the number one concern for all healthcare professionals who work with patients. Employees and students with the responsibility of care have a duty to put the interests of the people in their care first and to act to protect them if it is considered they may be at risk.
5. We understand that raising concerns in placements can be difficult for a student, and the School of Health & Psychological Sciences is committed to ensuring that raising a concern in placement will not impact on learning outcomes. This policy outlines the sources of support that the student can draw on within the School and their placement area.
6. Whilst the School is committed to this policy and positively encourages the raising of concerns, the School will not tolerate concerns that are made with malicious intentions or for personal gain. Those students raising concerns that are investigated and found to be of a malicious nature may be subject to the School's Reflection and Development Plan Policy or/and the Fitness to Practise (Train) Policy. These policies can be found here:
<http://www.city.ac.uk/health/courses/information-for-students-and-placement-partners/practice-education>
7. Students can raise concerns directly with the Care Quality Commission (CQC), <http://www.cqc.org.uk/>, which is the independent regulator of health and social care in England. This information is valuable to the CQC as it helps them decide when, where and what to inspect. When the CQC finds a service is not meeting the required standards of quality and safety, they will take action to ensure care improves. The CQC can be informed about concerns even if the complainant does not want to complain about the service.

Use of the Policy

8. The aim is to ensure that City, University of London meets its legal and statutory requirements to allow the facilitation of reporting concerns observed in a placement, and to have a mechanism in place to address and escalate these concerns where appropriate, whilst working in partnership with placements.
9. As a student training to join the healthcare profession, and as a staff member working in the healthcare sector, it is your duty to report any concerns which put the safety of the patients in your care or the public at risk.
10. Anyone reporting incidents on placement will be asked to identify themselves in case of

the need for follow up by the School. If you ask for your identity to be protected, it will not be disclosed without your consent.

11. If the situation arises where it is not possible to resolve the concerns without disclosing your identity, then an agreement will be reached whether and how to proceed. You should understand that there may be practical or legal limits to this confidentiality where the concern cannot be dealt with without revealing your identity, or that others may guess who has raised the concern. If you raise your concern anonymously, it will be much more difficult for the matter to be investigated, which in turn, affects public safety.
12. The policy will be operated in accordance with the University's duties under the Equality Act 2010, the Data Protection Act 2018, and Freedom of Information Act 2000. Staff operating this policy should refer to the relevant process accompanying document.

Definitions:

13. The School has a number of programmes with a practice component which uses various terminologies in relation to staff who educate and support students in a placement setting. For clarity and consistency, the policy and process use the following:
 - **Placement** is an organised practice experience which enables the student to observe, participate and practise their skills in a variety of real life contexts.
 - **Practice Supervisor** is a registered professional responsible for supervising a student's learning in a placement.
 - **Practice Assessor** is an NMC registered nurse/midwife responsible for assessing a student's learning practice.
 - **Practice Educator** is registered with the HCPC and has responsibility for students learning in practice.
 - **Link Lecturer** is an academic member of staff employed by City, University of London who is responsible for "linking" with the placement and the student.
 - **Practice Facilitator** (Manager of Nursery, or equivalent) is an education lead employed by the placement.
 - **Practice Education Lead** is an academic member of staff employed by City, University of London academic staff who has an oversight of practice.
 - **Visiting Clinical Tutors** is a person supervising students' clinical activities at City Sight.

Support for Students Wishing to Raise a Concern

14. Listed are a number of contacts that students can liaise with in a placement should they wish to raise a concern or gain support. Terminology varies across the healthcare setting and programmes, so you should access those which are most relevant to you. For example, a Speech and Language Therapy student will liaise with a Practice Teacher within the placement.
 - a. Placement Based Support
Practice Supervisor, Practice Assessor, Practice Educator, Clinical Tutor, Visiting Lecturer, Practice Teacher, Practice Education Lead

b. School Based Support

Link Lecturers, Supervisors, Visiting Clinical Tutors, Director of Professional Education, Personal Tutors, Practice Education Leads, Clinical coordinators, Director of Professional Education, Programme Directors

c. Other Support

The Student Union, CQC, relevant professional body/Trade Union

Disclaimer

15. The information in this policy is correct at the time of writing in January, 2023. The School reserves the right to make amendments to the policy provided if such amendments are (i) as a result of changes to PSRB regulations (ii) as a result of unforeseen events or circumstances beyond the School's control or (iii) are deemed reasonably necessary by the School. In the event that amendments are made, the School shall take reasonable steps to notify you as soon as is reasonably possible.

PROCESS FOR RAISING AND ESCALATING CONCERNS IN A PLACEMENT

1. Introduction

- 1.1 This process outlines the steps to be followed when a student is involved with or observes unsafe or unprofessional practice when in a placement area.

2. Roles and Responsibilities

2.1. Student

- 2.1.1 As a student training to join the healthcare profession you have an obligation to report any concerns which put the safety of the patients in your care or the public at risk.
- 2.1.2 If you have a concern about your experience in placement, please raise it with a senior member of practice staff, the link lecturer or personal tutor in the first instance. If it remains unresolved, please contact your Programme Director. In Midwifery the Lead Midwifery for Education (LME) should be informed.
- 2.1.3 Speaking up on behalf of people in your care and clients is an everyday part of your role. Just as raising genuine concerns represents good practice, 'doing nothing' and failing to report concerns is unacceptable. We recognise that in training to become a healthcare professional, by raising a genuine concern and acting with the best of intentions, you are working in line with the principles laid down in this process and you are meeting your professional responsibilities.
- 2.1.4 You should follow the relevant policy and process within the placement when raising or escalating concerns observed in practice.
- 2.1.5 It is your responsibility to seek support and guidance when raising or escalating a concern.
- 2.1.6 You should refer to the relevant PSRB guidance in relation to raising a concern or 'whistleblowing'. Links to these can be found under the 'Further Information' section.
- 2.1.7 Failure to report concerns may bring your fitness to practise into question and put your continuation on the programme at risk. If you experience any negative reactions within your placement after raising a concern appropriately, you must contact your link lecturer (or equivalent) or personal tutor for support and advice. The School of Health & Psychological Sciences will support you during the process.
- 2.1.8 We recognise that it might not be easy for you to raise a concern; you may not be sure what to do or the process may seem quite daunting. If you want some advice at any stage, we recommend that you talk to your personal tutor or link lecturer.

2.2. Practice

- 2.2.1 As a practice member of staff working in the healthcare sector it is your duty to report any concerns which puts the safety of the patients in your care or the public at risk by following the policy that is most relevant to your profession.
- 2.2.2 The placement is responsible for complying with and implementation of the Raising and Escalating Concerns in Practice Policy and Process.
- 2.2.3 You should facilitate and support students with the process of raising or escalating a concern.
- 2.2.4 If a practice member of staff has concerns about a student's conduct or practice, in

the first instance to liaise with the link lecturer and/or Programme Director. If after discussion the concerns need further investigation, these should be addressed via the Reflection and Development Plan (RAD) or the Fitness to Practise (Train) Policy.

2.3 School

2.3.1 The School is responsible for implementing and complying with the Raising and Escalating Concerns in Practice Policy and Process

2.3.2 As an academic working in the higher education sector supporting students in health and social care placements, it is your duty to report any concerns which could put the safety of the public at risk following the School's policy on raising and escalating concerns in practice.

2.3.3 You must facilitate, support and provide guidance to students with the process of raising or escalating a concern.

2.3.4 The School is responsible for reporting to the relevant internal governance and external regulatory bodies e.g. Professional Statutory and Regulatory Bodies (PSRB), Care Quality Commission (CQC), Health Education England (HEE).

3 **Level of Concern**

3.2 If you are raising a concern you are worried generally about an issue, misconduct or risk which affects others. You are acting as a witness to what you have observed, or to risks that have been reported to you, and are taking steps to draw attention to a situation which could negatively affect those in your care, other students, staff or the organisation.

3.3 If you are unsure whether something could be classed as a concern, you should seek advice from your practice assessor/educator/supervisor (or equivalent). Some examples of types of concerns are noted under section 3.5 below. It is also worth bearing in mind that raising a concern early can prevent minor issues becoming serious ones.

3.4 Where the concern may be a safeguarding issue, advice must be sought from the appropriate professional member of staff, as per the practice area policy. An example of a safeguarding issue would be neglect by care-givers.

3.5 Whilst the School is committed to this policy and positively encourages the raising of concerns, the School will not tolerate concerns with malicious intentions or for personal gain. Those students raising concerns that are investigated and found to be of a malicious nature may be subject to the Reflection and Development Plan (RAD) Policy or the Fitness to Practise (Train) Policy.

3.6 Concerns and serious Incidents can be divided into three categories, although the selection of category can be subjective and depends on context. Please note that these examples are not exhaustive:

Low	<ul style="list-style-type: none">• One student observed another student making an inappropriate comment• A student witnesses incorrect manual handling techniques used by staff• Student's poor communication skills reported by practice staff• A number of students reported not feeling welcome in a
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	practice area
Medium	<ul style="list-style-type: none"> • Concern over staffing levels and therefore patient safety • Issue raised in an academic context about the unprofessionalism of staff • Students asked to perform tasks beyond their remit • Misplaced paperwork which could have impacted on patient care
High	<ul style="list-style-type: none"> • Medication error made by a final year student • That a miscarriage of justice has occurred, is occurring or is likely to occur • A student raised a concern regarding the conduct of a patient, suggesting that the student experienced sexual abuse • That the health or safety of any individual has been, is being or is likely to be endangered

4 Process for Raising and Escalating Concerns

If you observe an incident or would like to report a concern in practice:

4.1 Step 1 – Raising a Concern

Students

If a student has a concern or has observed an incident on placement, they should raise it in the first instance, if feasible, with a senior member of staff, their practice assessor/practice educator/supervisor (or equivalent). If after discussing it with the relevant member of placement staff, the incident or concern requires further investigation then at this point the student should complete the online 'Incident on Placement – Raising Concerns Form' https://cityunilondon.eu.qualtrics.com/jfe/form/SV_4UXdj5UmXgge8OV

This form is in addition to any established placement policies. Their practice assessor/practice educator/supervisor (or equivalent) will be able to advise them on the local policies. If a student feels that they are unable to raise it with their practice assessor/practice educator/supervisor, they should contact their link lecturer or equivalent.

School

If an academic member of staff has been made aware of or have observed an incident or issue of concern in a placement setting area, they should liaise with the placement area staff first. If after discussing it with the member of placement staff, the incident or concern requires further investigation then the academic member of staff must complete the online 'Incident on Placement – Raising Concerns Form'. This form is in addition to any established placement policies.

https://cityunilondon.eu.qualtrics.com/jfe/form/SV_4UXdj5UmXgge8OV. They should support the placement and student as they would normally within their role.

4.2 Step 2 – Escalation of the Concern

If the concern remains unresolved, or is of a serious nature, it will be escalated to the Practice Education Lead or equivalent.

4.3 Step 3 – Serious or Unresolved Concerns

If the above channels have been followed or the matter is of a nature that cannot be resolved locally through earlier steps, the concern may be escalated directly to the Strategic Head of Practice or, in exceptional cases to Associate Dean for Partnerships, Placements and Employability.

Appendix A is a flowchart which shows the process a reported concern will take within the School.

5 Action Planning

5.1 On submission of the form, it is received by the Placements Team and documented on a spreadsheet. On receipt the form is directed to the relevant Practice Education Lead.

5.2 The Practice Education Lead will assess the severity of the concern and will take necessary steps to address the concern whilst liaising with the relevant parties e.g. Link lecturer or student within two working days.

5.3 Link lecturers must produce an action plan within two weeks of the concern being raised, which will inform the Practice Education Lead's reporting.

5.4 The Practice Education Lead will communicate with the Placements Team to ensure that the spreadsheet is updated with any actions taken.

5.5 In all cases an update on how the concern will be addressed will be reported to the originator of the concern and the placement.

5.6 Any serious or unresolved concern will be escalated to the Associate Dean for Partnerships, Placements and Employability.

5.7 Appendix B is a flowchart which shows the process an Action Plan will take within the School.

6 School Governance

6.1 The School's Practice Education Committee (PEC) is responsible for reporting and monitoring of the escalation of concerns raised in practice. The collated log of reported concerns will be considered at PEC as a standard agenda item. PEC will monitor for trends and ensure quality and parity of action plans. Reports can also be considered at other relevant committees and forums.

6.2 The log for the relevant programme must be discussed and monitored at the School-level governance for practice, e.g. Practice Advisory Board, (or equivalent)

6.3 The Associate Dean for Partnerships, Placements and Employability (Chair of PEC) will report on trends at each meeting of the Board of Studies (BoS), and will provide a summary report on an annual basis.

6.4 Additionally, as practice contributes to the assessment of students, it may be appropriate for some concerns to be reported on the Assessment Risk Register.

7 External Reporting

7.1 It is a requirement of NHS England WTE for City, University of London to have a reporting system to raise concerns and serious incidents, which is managed by

City and reported back to HEE on a monthly basis by the Associate Dean for Partnerships, Placements and Employability.

- 7.2 If the concern is of a serious nature and deemed necessary, it will be reported to HEE and the relevant PSRB and CQC within three days by Associate Dean for Partnerships, Placements and Employability.

8 **Further Information**

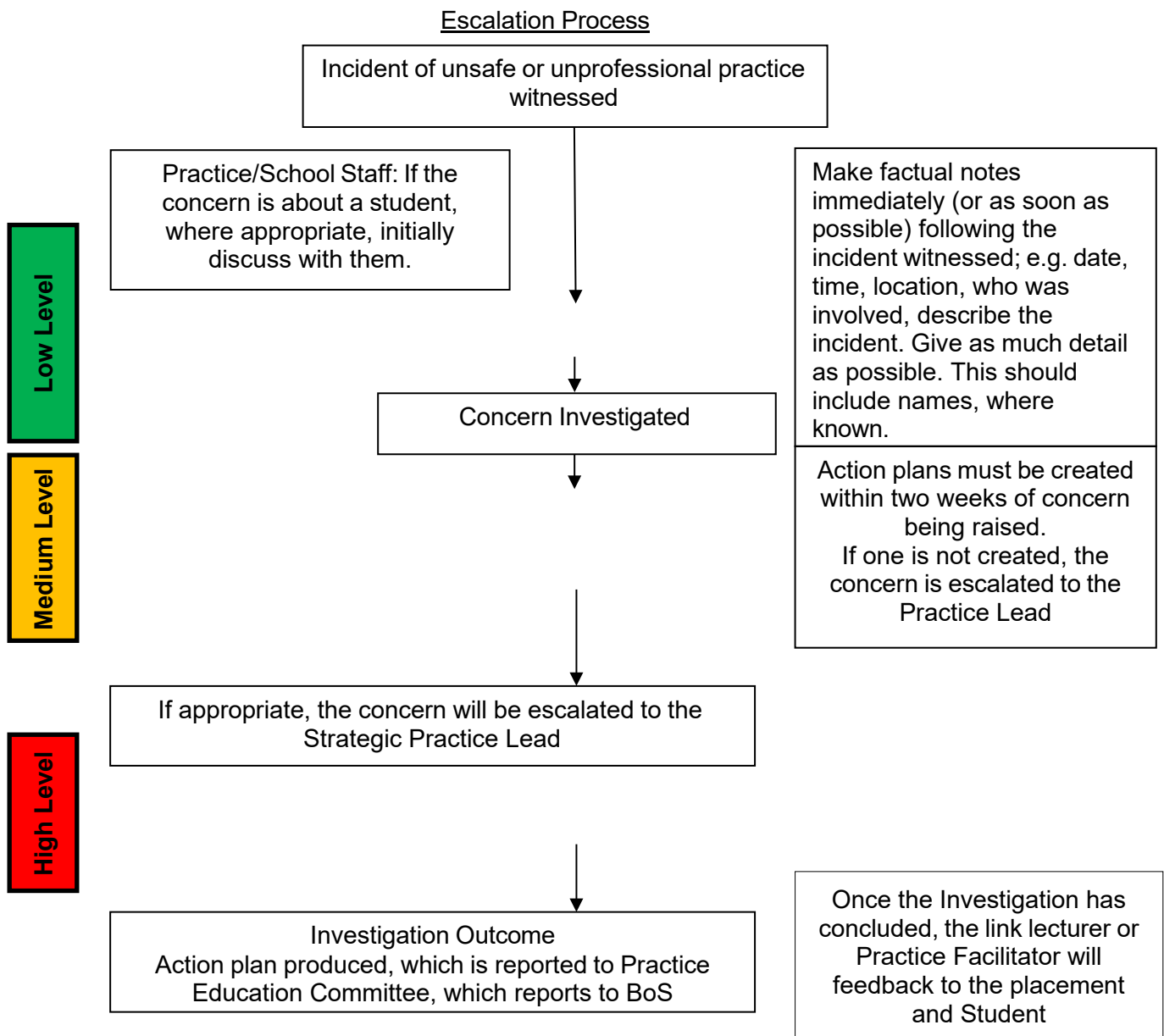
For further information, Professional Statutory and Regulatory Bodies reflect the importance of raising concerns in their Codes of Conduct:

- [The British Psychological Society \(BPS\)](#)
- [General Optical Council \(GOC\)](#)
- [Health and Care Professions Council \(HCPC\)](#)
- [Nursing and Midwifery Council \(NMC\)](#)

If the concern remains unresolved, or is of a serious nature, it should be passed to the Practice Facilitator

Appendix A

Reporting Incidents of Unsafe or Unprofessional Practice When On Clinical Placement



If you are a student and should the concern lead to further investigation, you may be required to write a statement and/or be interviewed regarding the incident. Should either of these be required you must contact your Programme Director so that the School can provide you with appropriate support and guidance.

Appendix B

Reporting Incidents of Unsafe or Unprofessional Practice When On Clinical Placement

