

<b>POLICY TITLE:</b>	<b>Freedom To Speak Up</b>
<b>Policy Number:</b>	OP67
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<b>Policy Owner:</b>	██████████ Associate Director of Patient Safety and Experience / Freedom to Speak Up Guardian
<b>Ratified by:</b>	██████████, Chief People Officer
<b>Responsible Signatory:</b>	██████████ Chief Quality Officer / Executive Lead for Freedom to Speak up
<b>Outcome:</b>	<p>This policy:</p> <ul style="list-style-type: none"> <li>• Aims to inform colleagues of the role of the Freedom to Speak Up Guardian and the respective Freedom to Speak up Champions and offer encouragement and reassurance to them in the event they have concerns about matters relating to their work at Priory.</li> <li>• Ensures that colleagues are aware of the resources available to them in respect of speaking up and the outcomes they can expect.</li> </ul>
<b>Cross Reference:</b>	<p> <a href="#">Priory Colleague Handbook</a>            HR04.3 <a href="#">Grievance</a>            HR04.6 <a href="#">Your Say Forums</a>            HR04.10 <a href="#">Anti-Bullying and Harassment</a>            HR04.1 <a href="#">Equality, Diversity and Inclusion</a>            LE03 <a href="#">Data Protection</a>            OP03 <a href="#">Complaints</a>            OP04 <a href="#">Incident Management, Reporting and Investigation</a>            OP06.1 <a href="#">Child Protection (Scotland)</a>            OP08.6 <a href="#">Safeguarding Children and Adults</a>            OP08.3 <a href="#">Adult Support and Protection (Scotland)</a>            OP21 <a href="#">Whistleblowing (Protected Disclosure)</a> </p>

#### EQUALITY AND DIVERSITY STATEMENT

Priory is committed to the fair treatment of all in line with the [Equality Act 2010](#). An equality impact assessment has been completed on this policy to ensure that it can be implemented consistently regardless of any protected characteristics (age, disability, gender identity and expression, marriage or civil partnership, pregnancy or maternity, race, religion or beliefs, sex, sexual orientation), and all will be treated with dignity and respect.

In order to ensure that this policy is relevant and up to date, comments and suggestions for additions or amendments are sought from users of this document. To contribute towards the process of review, email [LegalandComplianceHelpdesk@priorygroup.com](mailto:LegalandComplianceHelpdesk@priorygroup.com)

# FREEDOM TO SPEAK UP

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## 1 SCOPE

- 1.1 This policy applies to all Priory sites and services across England, Scotland, Northern Ireland and Wales. Where there are differences between nations, this will be clearly highlighted.
- 1.2 This policy applies to locum, permanent and fixed term contract colleagues who hold a contract of employment, workers agreement or engagement with Priory and secondees (including students), volunteers and bank staff. It also applies to external contractors, agency workers and other workers who are assigned to work at Priory sites. For simplicity, these will be referred to as colleagues within this policy without inferring any employment status.
- 1.3 Priory is committed to the principles of equality and diversity and will strive to eliminate unlawful discrimination in all its forms. We will strive towards fairness and giving equal opportunities for our service users, our colleagues and all of those that we have contact with.

## 2 INTRODUCTION

- 2.1 This policy incorporates key provisions from the National Policy on Freedom to Speak Up following the Sir Robert Francis review into whistleblowing in the NHS. All NHS organisations in England and those providing NHS-funded services are expected to implement this minimum standard in order to help normalise the raising of concerns for the benefit of all service users and colleagues. Priory has adopted the National Freedom to Speak Up agenda as a provider of NHS and because we recognise its value in ensuring service user and colleague health, safety and well-being.
- 2.2 This policy explains to colleagues the Priory position on speaking up about concerns and references the different ways in which colleagues are able to raise their concerns and the response that they can reasonably expect.
- 2.3 The policy explains the Freedom to Speak Up Guardian role. The policy also outlines the local arrangements whereby colleagues can raise concerns to their local Freedom to Speak Up Champion and the role of the overarching Priory Freedom to Speak Up Guardian.

### 3 PURPOSE

- 3.1 Priory acknowledges that speaking up about any concerns that colleagues have is important and helps Priory to improve the services it provides and provide a safe and secure working environment for colleagues who feel confident they can raise concerns without fear of reproach. The knowledge that colleagues are able to speak up and be heard gives reassurance to colleagues and to our service users and our stakeholders that there is a 'just and open' culture at all our sites.
- 3.2 Priory understands that individuals may feel worried about speaking up, but is committed to an open and honest culture, and wants everyone to feel able to speak up when they need to, in accordance with the five Priory values:
- a) Striving for excellence
  - b) Being positive
  - c) Putting people first
  - d) Acting with integrity
  - e) Being supportive
- 3.3 Priory will always take any 'speaking up' concerns seriously and is committed to ensuring that colleagues will have access to the support that they need, including knowing how to raise concerns in the right way.
- 3.4 Priory will appoint local Freedom to Speak Up Champions at our hospitals and covering the sub-regions for Priory Adult Care. The team, although primarily employed by Priory in their substantive roles, will act independently whilst in their Champion role.
- 3.5 Priory recognises that it already has a number of channels available for raising concerns, supported by relevant policies and these are detailed in the definitions below. Speaking Up is not intended to replace any of these but is to provide another method for people to raise concerns that may fall outside of these defined processes, or where these processes may have failed previously, or where individuals do not feel suitably assured to raise their concerns via these routes.

### 4 DEFINITIONS

- 4.1 **Speaking up** – The National Guardians' Office ([www.nationalguardian.org.uk](http://www.nationalguardian.org.uk)) states 'Workers can speak up about anything that gets in the way of high-quality effective care, or that affects their working life. It is something that should happen as 'business as usual'. Speaking up may take many forms including a quick discussion with a line manager, a suggestion for improvement submitted as part of a colleague suggestion scheme, raising an issue with a Freedom to Speak Up Champion, or bringing a matter to the attention of a regulator'.
- 4.2 **Whistleblowing**
- 4.2.1 Any serious concerns that colleagues have about any aspect of service provision, or the conduct of colleagues, or others acting on behalf of Priory, constitute whistleblowing. Concerns meeting these conditions are known as 'protected disclosures by workers' in the Public Interest Disclosure Act 1988. These include (as outlined in OP21 Whistleblowing (Protected Disclosures)):
- Criminal offences
  - Failure to comply with legal obligations
  - Actions that endanger the health or safety of colleagues or the public
  - Actions that cause damage to the environment
  - Bullying, harassment and/or victimisation
  - Unacceptable care practices relating to service users
  - Actions that are intended to conceal any of the above

- 4.2.2 Whistleblowing concerns can only be raised by existing or former colleagues. These do not include complaints from service users, their carers and other stakeholders, or colleague grievances. Further information can be found in policy OP21 Whistleblowing (Protected Disclosures).

#### 4.3 **Grievance**

- 4.3.1 Grievances are concerns or complaints raised by a colleague relating to their individual employment or treatment. Further information can be found in policy HR04.3 Grievance.

#### 4.4 **Complaint**

- 4.4.1 A complaint is defined as 'an expression of dissatisfaction about a service that requires a response'. Any complaint, whether it is of minor concern to the service user or stakeholder and can be dealt with immediately, or it is of more major concern to several parties, is an expression of dissatisfaction that requires a satisfactory and efficient resolution.

- 4.4.2 A service user, relative, visitor, funder, clinician, local authority, NHS authority, regulatory body or any other interested party or stakeholder acting with the authority of a service user may raise a complaint.

- 4.4.3 Colleagues or workers cannot raise a complaint unless the service user has asked them to do so on their behalf. If a colleague or worker has a concern around standards of care, these should be raised as whistleblow or speaking up concern.

- 4.4.4 Complaints may relate to any aspect of care, treatment, professional competencies or to any of the administrative or support services and may be made by telephone, in person, in writing or by email to any member of Priory Group personnel. Further information is available in policy OP03 Complaints.

#### 4.5 **Bullying, Harassment & Victimisation**

- 4.5.1 Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate or injure a colleague.

- 4.5.2 Harassment is defined as unwanted behaviour that is unreciprocated and unpleasant. It may also be unlawful. Harassment can take many forms, from extreme examples such as physical violence to less obvious actions such as ignoring a colleague.

- 4.5.3 Harassment is generally persistent, continuing after the recipient has asked for it to stop. However, a single incident can warrant action if it is serious enough.

- 4.5.4 Victimisation is the when an individual is treated less favourably, badly or suffers a detriment because they have made or supported a complaint or raised a grievance relating to discrimination or the Equality Act 2010, or because they are suspected of doing so.

- 4.5.5 Existing colleagues or workers can raise bullying, harassment and victimisation concerns. Further information is available in policy HR04.10 Anti-Bullying and Harassment.

### 5 **ROLES AND RESPONSIBILITIES**

- 5.1 All Priory colleagues have a duty to report any concerns they may have about service user care or safety.

- 5.2 Colleagues are responsible for the following under this policy:  
a) Reporting all incidents and concerns.

- b) Assisting with any investigations conducted under this policy.
- c) Acting with integrity.
- d) Accepting professional accountability and maintaining the standards of professional practice as set by the appropriate regulatory body.
- e) Taking reasonable care of health and safety at work for themselves, their colleagues, service users and members of the public.
- f) Acting in accordance with the express and implied terms of their contract.
- g) Not discriminating against service users, colleagues, or external individuals (for example, service user's family and other professionals), and to adhere to equal opportunities, equality, and human rights legislation.
- h) Protecting the confidentiality of personal information.

5.3 **Site Leaders and Managers** are responsible for the following under this policy:

- a) Encouraging colleagues to raise concerns at the earliest opportunity.
- b) Being approachable.
- c) Not discriminating against staff who have raised concerns.
- d) Taking any complaints/concerns made by colleagues seriously.
- e) Accepting the response to any Freedom to Speak Up findings.
- f) Responding to any complaints/concerns positively within the prescribed timescales.
- g) Giving due consideration to confidentiality.
- h) Ensure that there is a fair process for investigation.
- i) Maintaining good communication with the colleague who raised the concern
- j) Acting consistently and fairly.
- k) Providing support to colleagues.
- l) Keeping clear and concise records of the dates and time of action taken.
- m) Undertaking and applying relevant Speak Up training, and ensuring their direct reports and team members complete relevant training

5.4 **Freedom to Speak Up Champions** are responsible for the following under this policy:

- a) Being knowledgeable in all aspects of raising and handling concerns.
- b) Offering support and advice to any colleague who wishes to raise a concern or who are handling concerns.
- c) Ensuring feedback is given to the colleague raising a concern.
- d) Safeguarding the interests of the colleague raising a concern.
- e) Taking an objective view.
- f) Ensuring concerns are escalated as appropriate.
- g) Maintaining confidentiality as appropriate

5.5 **Priory Freedom to Speak Up Leads** are responsible

- a) Ensuring that Champions are affectively trained and supervised.
- b) Overseeing the concerns (and the response) that have been raised by colleagues across Priory within their designated regions / divisions
- c) Identifying common themes.
- d) Reporting to the Freedom to Speak up Guardian. Supporting the completion of reports as required.

5.6 **Priory Freedom to Speak Up Guardian** is responsible for the following under this policy:

- e) Ensuring that Champions are affectively trained and supervised.
- f) Overseeing the concerns (and the response) that have been raised by colleagues across Priory.
- g) Identifying common themes.
- h) Reporting to the divisional management teams, Priory UK Board and externally.
- i) Completing such reports as required for example contributing to the Annual Quality Account.

5.7 **Divisional Management Team**

- a) Receiving reports as outlined at 6.28 / 6.29
- b) Responding to recommendations made by the Freedom to Speak Up Guardian.

5.8 **Priory UK Board** is responsible for the following under this policy:

- a) Receiving the annual report on Speaking Up concerns.
- b) Ensuring that recommended actions following investigations are prioritised and actioned.
- c) Creating an organisational culture where colleagues are encouraged to raise concerns and are supported when they do.
- d) Ensuring Non-Executive Directors have regular oversight of and input to the Freedom to Speak Up programme and make recommendations for improvement as required.
- e) The Chief Quality Officer will hold Executive responsibility for the effective implementation of the FTSU process.

**6 PROCESS REQUIREMENT**

6.1 Under this policy, if any colleague has a concern about any matter big or small (such as concerns about care and treatment, that they believe has the potential to harm others or themselves) then they are encouraged to speak up.

6.2 A concern might include but is not restricted to:

- Unsafe service user care
- Unsafe practice
- Unsafe working conditions
- Malpractice and Professional Misconduct
- Inadequate induction or training of colleagues
- Lack of, or poor response to, a reported service user safety incident
- Suspicions of fraud
- A bullying or negative culture across a team, a service, and/or Priory overall.

6.3 Colleagues should keep in mind that they do not need to wait for or find proof to speak up, as Priory would always prefer that the matter be raised whilst it is still a concern. If in doubt, please Speak Up.

6.4 In the event that a concern raised to a local Freedom to Speak up Champion is not considered to be a 'speaking up' issue, the colleague will be given guidance and directed to the appropriate support. For example, it may be that the concern falls under another Priory policy, such as a grievance, in which case the colleague will be advised on how to follow that process. See Appendix 2. Additional proportionate actions may be taken by the local Freedom to Speak up Champion as required, in conjunction with the Priory Freedom to Speak Up Guardian where necessary.

6.5 **Feel safe to raise a concern** - If a colleague raises a genuine concern under this policy they will not be at risk of losing their job or experiencing any form of reprisal, detriment or discrimination as a result of raising the concern. Provided the colleague is acting honestly, it does not matter if they are mistaken or if there is an innocent explanation for the concerns.

6.6 Priory will not tolerate the harassment or victimisation of anyone speaking up. Nor will it tolerate any attempt to bully the colleague into not speaking up. Similarly, Priory will not tolerate any wilful, malicious or deliberate misuse of this policy, as this could serve to undermine the integrity of the 'speaking up' process. Any such behaviour is a breach of Priory values and, if upheld following investigation, may result in disciplinary action up to and including dismissal.

- 6.7 **Confidentiality** - We hope that colleagues will feel comfortable raising a concern openly, but Priory appreciates that colleagues may want to raise it confidentially. Priory will keep the colleague's identity confidential, if that is what the colleague wants, unless they are required to disclose it by law. A colleague can choose to raise a concern anonymously, by writing to Freedom to Speak Up at Priory, 5th Floor, 80 Hammersmith Road, London, W14 8UD, without giving anyone their names, but that may make it more difficult for Priory to investigate thoroughly and give feedback on the outcome. Where an investigation is required, confidentiality will be maintained to a reasonable extent however, the investigation of allegations will normally require limited disclosure to witnesses on a 'need to know' basis.
- 6.8 **Who can speak up?** - Anyone who works (or has worked) at Priory can raise concerns. This includes those specified in the scope above.
- 6.9 **Who should a concern be raised with?** - In many circumstances the easiest way to get a concern resolved will be to raise it formally or informally with the colleague's line manager (or tutor), but where the colleague does not feel it is appropriate to do this, they can use any of the options set out below in the first instance.
- 6.10 If raising it with the line manager does not resolve matters, or the colleague does not feel able to raise it with them, they can contact a senior manager / their local human resources team contact or one of the following people, all contact details are available in **Appendix 1**:
- **The Local Freedom to Speak Up Champion** – there are designated champions and leads at Priory hospitals and across the Priory Adult Care geographic regions. How do I know who my Champion is? Check the Priory intranet page for an up to date list and/or check the posters on colleague noticeboards.
  - **Freedom to Speak up Leads** – these roles are held by Priory Colleague Engagement Leads for Priory Healthcare and Adult Care. How do I know who a FTSU Lead is? Check the Priory intranet page for an up to date list and/or check the posters on colleague noticeboards.
  - **Priory Freedom to Speak Up Guardian** - this is a key role identified in the Freedom to Speak Up review to act as an independent and impartial source of advice to colleagues at any stage of raising a concern, with the ability to access anyone in the organisation, including the Priory Chief Executive Officer or if necessary, outside the organisation. You can contact the Priory Freedom to Speak Up Guardian
    - By email to: [freedomtospeakup@priorygroup.com](mailto:freedomtospeakup@priorygroup.com)
    - By letter: Freedom to Speak Up Guardian, Priory Group, Fifth Floor, 80 Hammersmith Road, London, W14 8UD
  - **The Whistleblowing Hotline:** 0800 484 0816, or sending your concerns directly to [whistleblowing@priorygroup.com](mailto:whistleblowing@priorygroup.com)
- 6.11 If for any reason a colleague does not feel comfortable raising the concern internally, they can raise concerns with external bodies, but we would encourage colleagues to use the Priory Speaking Up / whistleblowing processes wherever possible given that this will assist in ensuring a prompt local response. Colleagues are however at liberty to raise their concerns outside the organisation for example with:
- a) Regulators such as Health Improvement Wales, Health Inspectorate (Scotland), Regulation and Quality Improvement Authority (Northern Ireland) or Care Quality Commission (England) for quality and safety concerns
  - b) NHS Counter Fraud Authority for concerns about fraud and corruption
  - c) The relevant regulatory body for example General Medical Council, Nursing and Midwifery Council.
- 6.12 **Advice and Support** - The following local support is available to colleagues from:
- a) Their line manager
  - b) Senior Managers – details are on the relevant Priory division intranet page
  - c) Local HR contact – see the People Team contact details which should be available in your site and are published on the intranet to find out who this is

- d) The Employee Assistance Programme
  - e) Bullying and harassment line
  - f) Your Say Forum representatives and local Mental Health First Aiders.
- 6.13 Whichever route is chosen, the colleague must if at all possible be ready to explain as fully as they can the information and circumstances that give rise to the concern in confidence
- 6.14 **What will happen after someone has spoken up?** – Priory is committed to the principles of the Freedom to Speak Up review and its vision for raising concerns, and will respond in line with them. See Appendix 2
- 6.15 Priory is committed to listening to the Priory workforce, learning lessons and improving service user and colleague care. On Speaking Up, the concern will be recorded on the Freedom to Speak Up confidential, secure database made with the colleague.
- 6.16 The central record will record the date the concern was received, whether the colleague has requested confidentiality, a summary of the concerns and dates when updates or feedback have been given.
- 6.17 **Assessment/review** – Where an individual does not agree for their concerns to be explored and addressed through existing Priory processes i.e. complaints, HR and whistleblowing, the Freedom to Speak Up Champions / Lead and or Guardian will, if appropriate, request investigations in liaison with regional and divisional management teams whilst respecting an individual's choice of confidentiality or anonymity. See Appendix 2.
- 6.18 Once received, the concern will be assessed and a plan made for actions to be taken. A check will be made as to whether similar concerns have been raised and how these have been dealt with / are being dealt with. Wherever possible Priory will carry out a single investigation (so, for example, where a concern is raised about a service user safety incident, it will usually undertake a single investigation that considers and reviews the concern and the wider circumstances of the incident).
- 6.19 The concerns will be assessed and reviewed and where appropriate, the matters raised may:
- (a) Be investigated quickly and transparently by a sufficiently independent and trained manager and/or investigated through the disciplinary process.
  - (b) Be referred to the police.
  - (c) Be referred as a safeguarding concern in accordance with the Safeguarding policies and the service's Local Procedures.
  - (d) Form the subject of an independent inquiry.
  - (e) Be referred to an external professional body.
  - (f) Be referred to a regulatory body under which the Priory service operates.
- 6.20 If the concern indicates that there has been a previously unreported serious incident, an investigation will be carried out in accordance with policy OP04 Incident Management, Reporting and Investigation. The investigation will be objective and evidence-based, and will produce a report that focuses on identifying and resolving any issues, and learning lessons to prevent problems recurring. Wherever appropriate the report or a summary of the report findings will be shared with the colleague raising the initial concern, or they will be informed or the reason the full report cannot be shared.
- 6.21 Following consideration with the colleague, it may be concluded that the concern would be better considered under another process for example, the Priory process for dealing with bullying and harassment. If so, this will be discussed with the colleague by the FTSU role involved.
- 6.22 **Communicating with the colleague** – Priory will always treat the colleague with respect at all times and express gratitude for raising their concerns. The concerns will be discussed with



the colleague to ensure there is a mutual understanding of the concerns at hand. Advice will be given as to what they can expect to happen and arrangements will be put in place to them up to date with progress.

- 6.23 Wherever possible, Priory will share the full investigation report with the colleague (while respecting the confidentiality of others). The investigator will not be the Freedom to Speak Up Champion / Guardian but instead someone who is suitably independent of the service. In the first instance the investigator will report back to the Freedom to Speak up Champion/Guardian.
- 6.24 **How will Priory learn from the concern?** – The focus of the investigation will be on ensuring the safety and wellbeing of service users and colleagues and others and improving the service Priory provides for service users as a whole. Where it identifies improvements that can be made, the FTSU Leads will report divisionally through the Triangulated Learning forums of Healthcare and Adult Care.
- 6.25 Where concerns against any individual colleagues are substantiated they may be subject to action under Priory policies, but due to confidentiality, the colleague raising concerns will not be entitled to know the outcome for that colleague.
- 6.26 Lessons will be shared with teams across the organisation, or more widely, as appropriate. The Priory UK Board supports colleagues raising concerns and wants them to feel free to speak up.
- 6.27 The Freedom to Speak Up Guardian will report quarterly into the Quality Assurance Committee, and issue an annual report outlining all concerns raised and the action taken. Any such reports will maintain the confidentiality of those speaking up and will contribute to the annual Priory Quality Account report.
- 6.28 The Freedom to Speak Up Guardian will report and escalate any concerns through the governance and assurance process within Priory i.e. in detail via the monthly Quality Assurance Committee and at a high level via the Priory UK Operating Boards and/or UK Board.
- 6.29 **Freedom to Speak Up National Guardian** – The Freedom to Speak Up National Guardian (a central national role covering all NHS and independent sector providers) can independently review how colleagues have been treated having raised concerns where their employing body may have failed to follow good practice, working with some of the bodies listed above to take action where needed.

## **7 TRAINING**

- 7.1 The Freedom to Speak Up Champions will complete the NHSE e-learning for health 'Speak Up, Listen Up, Follow Up' online training. They will also receive specific induction to the Freedom to Speak Up Champion role facilitated by Freedom to Speak Up Guardian, Executive and non-Executive leads, and attend regular support networks.
- 7.2 All Priory staff will complete the NHSE e-learning for health 'Speak Up' online training and a short introductory session at Priory Induction

## **8 SUCCESS CRITERIA/MONITORING EFFECTIVENESS**

- 8.1 The success and effectiveness of the policy will be monitored annually as follows:
- Cases will be reviewed by the Priory Freedom to Speak Up Guardian and themes identified, both in the type of event being spoken up about and the services involved.
  - The Priory UK Board will be given high-level information about all concerns raised by Priory colleagues through this policy and what it is doing to address any problems.

## 9 REFERENCES

- 9.1 Sir Robert Francis: Freedom to Speak Up Report (February 2015): [http://freedomtospeakup.org.uk/wp-content/uploads/2014/07/F2SU\\_web.pdf](http://freedomtospeakup.org.uk/wp-content/uploads/2014/07/F2SU_web.pdf)  
 Freedom to Speak Up: A guide for leaders in the NHS and organisations delivering NHS services (June 2022)  
[https://www.england.nhs.uk/wp-content/uploads/2022/04/B1245\\_ii\\_NHS-freedom-to-speak-up-guide-eBook.pdf](https://www.england.nhs.uk/wp-content/uploads/2022/04/B1245_ii_NHS-freedom-to-speak-up-guide-eBook.pdf)

## 10 EQUALITY IMPACT ASSESSMENT

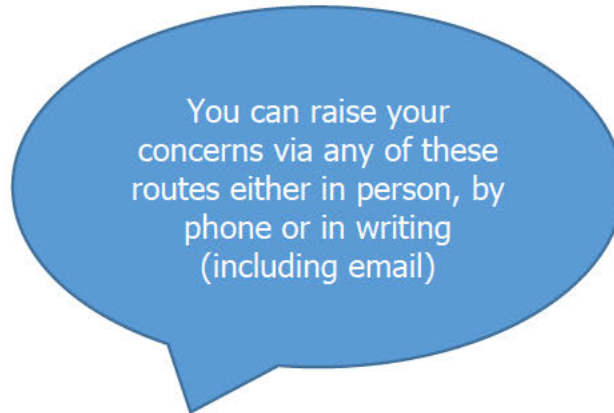
10.1	<b>How is the policy likely to affect the promotion of equality and the elimination of discrimination in each of the groups?</b>			
	<b>Protected Characteristic</b> (Equality Act 2021)	<b>Impact</b> Positive/ Negative/ None	<b>Reason/ Evidence of Impact</b>	<b>Actions Taken</b> (if impact assessed as Negative)
	Age	None	Priory is committed to treating people fairly and equitably regardless of their age, disability, gender identity and expression, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. An equality impact assessment has been carried out for this policy and no significant issues have been identified.  This policy has also been assessed and meets the requirements of the Mental Capacity Act 2005.	
	Disability	None		
	Gender identity and expression	None		
	Marriage or civil partnership	None		
	Pregnancy or maternity	None		
	Race	None		
	Religion or beliefs	None		
	Sex	None		
	Sexual orientation	None		
	Other, please state:			
	<b>EIA completed by:</b>			
	<b>Name:</b>	[REDACTED]		
	<b>Role/Job Title:</b>	Director of Risk Management		
	<b>Date completed:</b>	28/07/2022		

## 11 APPENDICES

- 11.1 **Appendix 1** – How should I raise my concern?  
**Appendix 2** – Freedom to Speak Up Process  
**Appendix 3** – Freedom to Speak Up structure  
**Appendix 4** – Training Matrix  
**Appendix 5** – Role Descriptors

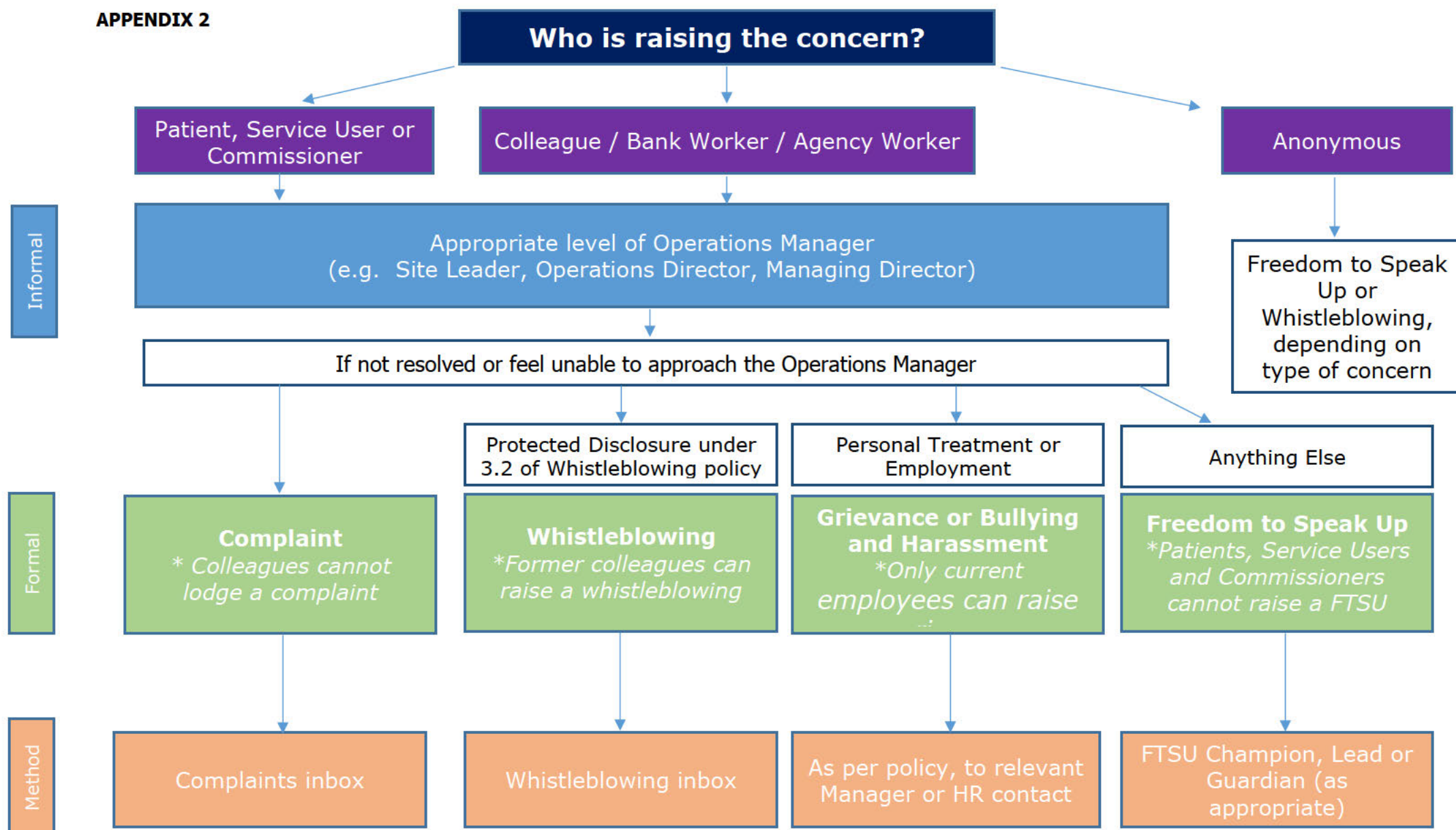
## APPENDIX 1

### HOW SHOULD I RAISE MY CONCERN? CONTACT DETAILS AT PRIORY



- Your immediate Line Manager
- A senior manager (you can find details on management structures on the Priory intranet)
- Your divisional human resources lead (you can find details on management structures on the Priory intranet)
- Freedom to Speak Up:
  - By Email: [freedomtospeakup@priorygroup.com](mailto:freedomtospeakup@priorygroup.com)
  - By letter: Freedom to Speak up Guardian, Priory, 5th Floor, 80 Hammersmith Road, London, W14 8UD.
- Whistleblowing: The Whistleblowing Hotline: 0800 484 0816, or sending your concerns directly to [whistleblowing@priorygroup.com](mailto:whistleblowing@priorygroup.com)
- Bullying and Harassment Helpline: Tel. 0333 212 3665

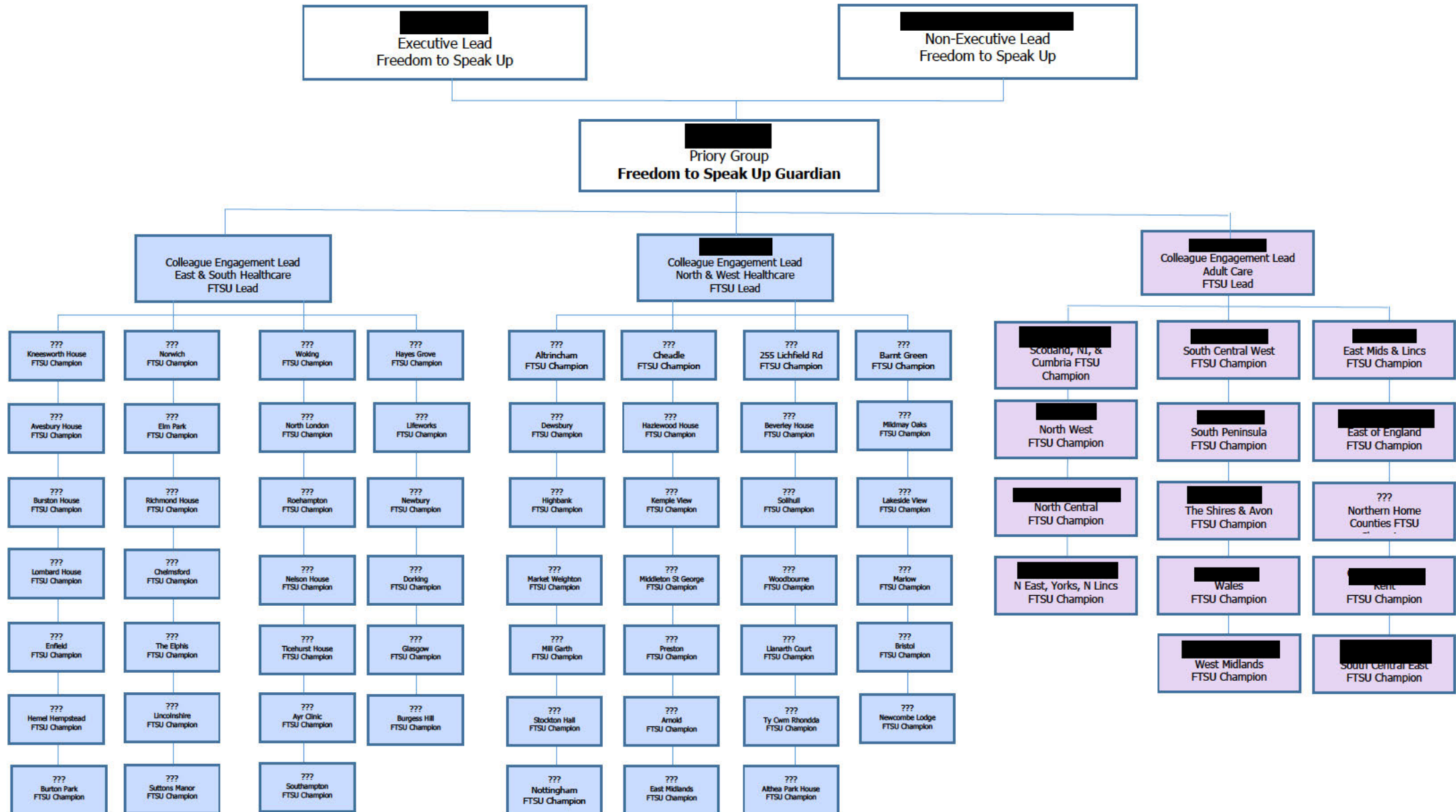
## APPENDIX 2





## APPENDIX 3

## FREEDOM TO SPEAK UP STRUCTURE



**APPENDIX 4****FREEDOM TO SPEAK UP TRAINING MATRIX**

It is vital that all colleagues, regardless of their role undertake Speak Up training to enable and promote an open and transparent culture to grow and establish.

Therefore the following training expectations have been outlined for all staff:

Freedom to Speak Up Training	Speak Up	Listen Up	Follow Up	Priory FTSU Induction	Additional FTSU Training	FTSU support & Supervision	NGO FTSUG training		
ALL Priory Staff									
Leadership Roles / Line Managers									
Senior Leaders / Senior Managers									
Executive Team Members									
FTSU Champions									
<u>FTSU</u> Executive Lead									
FTSU non-Executive Lead									
FTSU Guardian									

## APPENDIX 5

## FREEDOM TO SPEAK UP ROLE DESCRIPTORS

**Role Profile**  
**Freedom to Speak Up Champion**

**Purpose**

The overall responsibility is to support the site/function in creating a culture of openness and transparency to ensure Priory is a workplace where colleagues feel able to raise concerns without fear of retribution. The definitive aim is to protect patient safety and improve the quality of care.

**Responsibilities**

- To be a point of contact for individuals who require advice, to inform them of the options available,
- Where concerns on patient safety, environment, resources etc. are raised, *signpost* the colleague to the correct channel of escalation to ensure early remedy.
- *Take immediate appropriate action* on matters that colleagues raise particularly where safety and quality may be compromised
- Where necessary, escalate concerns to the Freedom to speak up Lead / Guardian if colleague requests this route or if the concern is not appropriate to be dealt with at site/function level or with SMT at sites.
- Promote local speaking up channels and sources of support and guidance to colleagues
- Liaise with HDs / DoCs / HR BPs to measure the effectiveness and impact of approach to Freedom to speak up channels
- Seek guidance and support from Freedom to speak up Leads / Guardian on complex matters
- Maintain log of cases/actions dealt with at site/function level.
- Capture local activity data, and identify themes, trends and lessons learnt and share with Freedom to Speak Up Lead / Guardian, and sites, where required
- Support sites in taking action to reduce barriers to speaking up, prioritised according to local need
- Function independently, impartially and objectively as the FTSU Champion for hospital sites whilst working in conjunction with colleagues

**Knowledge / Education / Skills**

- Creative, positive and pragmatic problem-solver, able to articulate and champion their solutions to deliver outcomes.
- Ability to maintain professional boundaries.
- Able to build trust and rapport with pace and authenticity
- Knowledge of freedom to speak up agenda
- Ability to maintain confidentiality
- Uphold Priory values and behaviours
- Act as role model to colleagues with integrity
- Good time management skills to balance the role with their existing role
- Able to show and demonstrate an empathetic approach
- The ability to remain non-judgmental when presented with information

**Experience**

It is desirable to prior experience in a healthcare assistant / support worker role to ensure understanding of the context of colleague feedback and to translate this into realistic, deliverable recommendations.

**Communication**



The role holder will regularly be talking to colleagues and therefore communicating with empathy and compassion about potentially emotive subjects will be important. Experience of flexing style dependant on level liaising within the organisation is essential. Strong written & verbal communication skills are essential.

## Role Profile Freedom to Speak Up Lead (Regional)

### Purpose

The overall responsibility is to support the region in creating a culture of openness and transparency to ensure Priory is a workplace where colleagues feel able to raise concerns without fear of retribution. The definitive aim is to protect patient safety and improve the quality of care.

### Responsibilities

- Where concerns on patient safety, environment, resources etc. are raised, *signpost* the colleague to the correct channel of escalation to ensure early remedy.
- To lead on regional Freedom to speak up clinics (support meetings) and offer availability as frequently as required.
- *Take immediate appropriate action* on matters that colleagues raise particularly where safety and quality may be compromised
- Where necessary, escalate concerns to the Freedom to speak up Guardian if colleague requests this route or if the concern is not appropriate to be dealt with at site/function level or with SMT at sites.
- Promote local speaking up channels and sources of support and guidance to colleagues
- Liaise with MDs/ODs/HR BPs to measure the effectiveness and impact of approach to Freedom to speak up channels
- Seek guidance and support from Freedom to speak up Guardian on complex matters
- Maintain log of cases/actions dealt with at a regional level.
- Capture regional data and identify regional themes, trends and lessons learnt and share with Freedom to speak up Guardian, and sites, where required
- Support sites in taking action to reduce barriers to speaking up, prioritised according to local need
- Function independently, impartially and objectively as the Divisional FTSU Lead(s) whilst working in conjunction with colleagues throughout Priory

### Knowledge / Education / Skills

- Creative, positive and pragmatic problem-solver, able to articulate and champion their solutions to deliver outcomes.
- Ability to maintain professional boundaries.
- Able to build trust and rapport with pace and authenticity
- Knowledge of freedom to speak up agenda
- Ability to maintain confidentiality
- Uphold company values and behaviours
- Act as role model to colleagues with integrity
- Good time management skills to balance the role with their existing role
- Able to show and demonstrate an empathetic approach
- The ability to remain non-judgmental when presented with information

### Experience

It is desirable to have previous experience of working in social care or healthcare or support environment, ideally as a care / support worker to ensure understanding of the context of colleague feedback and to translate this into realistic, deliverable recommendations.



## Communication

The role holder will regularly be talking to colleagues and therefore communicating with empathy and compassion about potentially emotive subjects will be important. Experience of flexing style dependant on level liaising within the organisation is essential. Strong written & verbal communication skills are essential.

## Role Profile Freedom to Speak Up Guardian

### Purpose

The overall responsibility is to support Priory in creating a culture of openness and transparency to ensure it is a workplace where colleagues feel able to raise concerns without fear of retribution. The definitive aim is to protect patient safety and improve the quality of care and to enable issues raised are used as opportunities for learning and improvement.

### Responsibilities

The FTSU Guardian will be the main point of contact for staff who would like to raise a concern if it has not been addressed through other routes:

- Where concerns on patient safety, environment, resources etc. are raised, *signpost* the colleague to the correct channel of escalation to ensure early remedy.
- To supervise and support FTSU Leads / Champions and offer availability as frequently as required.
- *Take immediate appropriate action* on matters that colleagues raise particularly where safety and quality may be compromised
- Where necessary, escalate concerns to the Freedom to speak up Guardian if colleague requests this route or if the concern is not appropriate to be dealt with at site/function level or with SMT at sites.
- Promote local speaking up channels and sources of support and guidance to all colleagues
- Liaise with MDs/ODs/HR BPs to measure the effectiveness and impact of approach to Freedom to speak up channels
- Seek guidance and support from The National Guardians Office on complex matters
- Capture FTSU activity data and identify themes, trends and lessons learnt and share across all of Priory
- Visit wards and teams formally and informally to discuss any concerns they may have and to gain an understanding of the general experiences of staff on those departments.
- Function independently, impartially and objectively as the FTSUG whilst working in conjunction with colleagues throughout Priory
- Monitor the outcome of the process to ensure that no negative effects are experienced by the staff member raising the concern.
- Report regularly to the Priory Quality Assurance Committee and Clinical Governance of FTSU activity, trends and learning.

Freedom to Speak Up Guardians are responsible for taking action to promote the following outcomes:

- Workers throughout the organisation have the capability, knowledge, and skills they need to speak up themselves and to support others to speak up
- Speaking up policies and processes are effective and constantly improved
- Senior leaders role model effective speaking up
- All workers are encouraged to speak up
- Individuals are supported when they speak up
- Barriers to speaking up are identified and tackled
- Information provided by speaking up is used to learn and improve
- Freedom to speak up is consistent throughout the health and care system, and ever improving

### Knowledge / Education / Skills

- Creative, positive and pragmatic problem-solver, able to articulate and champion their solutions to deliver outcomes.
- Ability to maintain professional boundaries.
- Able to build trust and rapport with pace and authenticity
- Knowledge of freedom to speak up agenda
- Ability to maintain confidentiality
- Uphold company values and behaviours
- Act as role model to colleagues with integrity
- Good time management skills to balance the role with their existing role
- Able to show and demonstrate an empathetic approach
- The ability to remain non-judgmental when presented with information
- Partnership building and relationship management
- Measuring effectiveness and impact
- Working with senior leaders

### Experience

It is desirable to have previous experience of working in social care or healthcare, ideally as a clinical leader / manager to ensure understanding of the context of colleague feedback and to translate this into realistic, deliverable recommendations.

### Communication

The role holder will regularly be talking to colleagues and therefore communicating with empathy and compassion about potentially emotive subjects will be important. Experience of flexing style dependant on level liaising within the organisation is essential. Strong written & verbal communication skills are essential.