

# Raising and Escalating Concerns

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## 1. Scope

- 1.1. This Policy and Procedure applies to all relevant undergraduate and postgraduate students from the point of application throughout their programme of study and where relevant up to and including the point of confirming eligibility to register with appropriate the Professional, Statutory and Regulatory Body.
- 1.2. This Policy and Procedure applies at all times and in a range of practice learning environments, including placement, on-site practical or simulated learning and work experience where a member of staff or a student observes or identifies a situation or event that has potential risk to cause harm to an individual, individuals or organisation.
- 1.3. This Policy and Procedure may apply to other programmes where students are learning in a regulated practice environment. In such cases, the Faculty will draw the student's attention to this Policy and Procedure before the student enters the practice learning environment.
- 1.4. This Policy and Procedure is written in addition to any Placement Provider accident, incident or concerns reporting procedure which Students need to adhere to.
- 1.5. The School of Education has its own local policies and procedures for responding to concerns in practice learning environments and therefore will not follow this Policy and Procedure.

## 2. Introduction

- 2.1. Leeds Trinity University is committed to ensuring that all students, including apprentices and those studying with our franchise partners, undertaking a course of study leading to the recommendation of their professional registration with a Professional, Statutory or Regulatory have the skills, knowledge, health and character to work effectively and safely.
- 2.2. The University is also committed to promoting an open and diverse community where the rights and dignity of all are respected regardless of their background. This is reflected in the University's [mission, vision and values](#) and our [Equality, Diversity and Inclusion Policy](#).
- 2.3. Staff and Students on Nursing and Allied Health Professionals (AHP) related courses and Social Work have a professional and moral obligation to ensure the best possible care for service users as per Professional, Statutory and Regulatory Bodies requirements.
- 2.4. This Policy and Procedure has been developed to help support staff and students when raising concerns about poor practice and to ensure that any incidents that cause concern and are witnessed by staff or students whilst on practice placements or University business are reported appropriately.
- 2.5. In addition, this procedure will support the development of students to fulfil their statutory and professional responsibilities as required by the relevant PSRB.

- 2.6. Students have a duty to report dangerous, abusive, discriminatory or exploitive behaviour and practice in all situations they may come across during practice and not just in an area where they may be learning or being assessed.
- 2.7. The University understands the relative lack of power and vulnerability of students who may be undergoing a process of assessment by work-based staff in a practice learning environment. The University takes seriously its responsibilities towards students and regards it as important that students are able to voice their concerns and that their interests are safeguarded as far as possible.
- 2.8. The University will endeavour to ensure that no student is disadvantaged as a result of raising a concern under this procedure, provided that it is done in good faith and without malice. A malicious or vexatious complaint however could result in disciplinary action being taken against a student under the Student Conduct and Discipline Code or Fitness to Practise Policy and Procedure.
- 2.9. Any action taken under this Policy and Procedure should be consistent with the relevant practice learning provider or local authority policies and procedures including those relating to safeguarding.

### **3. Responsibility**

- 3.1. The relevant Faculty is responsible for making prospective students and current students aware of Leeds Trinity University policies and procedures in relation to Raising and Escalating Concerns and any relevant PSRB requirements prior to enrolment.
- 3.2. The relevant Faculty is responsible for signposting students to this Policy and Procedure as well as any relevant Code(s) of Conduct, in the programme handbook and drawing these to the attention of students throughout the programme's duration.
- 3.3. It is the responsibility of each student to familiarise themselves with this Policy and Procedure as well as the PSRB requirements and expectations relevant to their programme as set out in the relevant programme handbook.
- 3.4. Failure to report a concern under this procedure where required may call into question a student's fitness to practise and may result in a student being subject to an investigation.
- 3.5. Some PSRBs, such as the [NMC](#), have their own raising concerns policies or procedures, and students and staff are expected to familiarise themselves with and apply these as appropriate in practice learning environments.
- 3.6. Specific members of staff have particular roles set out throughout this Policy and Procedure. More broadly, all members of staff engaged in the delivery of any relevant programmes have a responsibility to read, understand and implement this procedure where necessary. Failure to do so may lead to disciplinary action against the member of staff under the University's Staff Disciplinary Policy.
- 3.7. Any concerns raised under this procedure may require the University to make a report to a third party, including the police, social services, the NHS or other PSRB. This may include reporting the conduct of student, University staff or placement staff.

- 3.8. Where the student is also an employee of the placement organisation or practice setting provider and a concern arises within the scope of that student's employment, the student must follow their employer's whistleblowing or raising concern procedure and should also inform the senior academic staff member supporting the practice setting.
- 3.9. Freedom to Speak Up is about encouraging a positive culture where people feel they can speak up and their voices will be heard, and their suggestions acted upon. Freedom to Speak Up Guardians support people who work or receive services in Health and Social Care to speak up when they feel that they are unable to do so by other routes. They ensure that people who speak up are thanked, that the issues they raise are responded to, and make sure that the person speaking up receives feedback on the actions taken. Leeds Trinity University has a Freedom To Speak Up Guardian who you can speak to confidentially about raising and escalating a concern. If you wish to arrange to meet the Freedom to Speak Up Guardian, please email [fts@leedstrinity.ac.uk](mailto:fts@leedstrinity.ac.uk).

#### 4. Types of Concern

- 4.1. Concerns which would require a report to be made under this procedure include, but are not limited to, the following examples:
- Where a criminal offence is suspected to have occurred.
  - Physical abuse – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
  - Domestic violence – including psychological, physical, sexual, financial, emotional abuse or honour-based violence.
  - Sexual abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
  - Psychological abuse – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyberbullying, isolation or unreasonable or unjustified withdrawal of services or support networks.
  - Financial or material abuse – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions or the misuse or misappropriation of property, possessions or benefits.
  - Modern slavery – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. Victims of modern slavery may be patients, clients, service users, members of staff, members of the public or other students.
  - Discriminatory abuse – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
  - Organisational/Institutional abuse – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home.

This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

- Neglect and acts of omission (failure to act) – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- Self-neglect – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

## 5. Raising a Concern

- 5.1. It is better that all health and social care staff and any student raise concerns about an incident which later turns out to have a satisfactory explanation, than to not raise concerns when, in retrospect, this should have happened. Both staff and students have a duty of care to patients, service users, other students and members of the public to report any concerns as required.
- 5.2. Raising a concern under this procedure is different from a student making a complaint about their own experience in a practice learning environment. Students who would like to make a complaint about their experience in a practice learning environment should consult the complaints procedure set out in the programme or practice learning environment handbook. Formal complaints should be made under the University's Student Complaint Policy and Procedure.
- 5.3. Students need to be reminded that while reflection on practice is a key element of academic work, raising concerns for the first time about poor standards of practice is not appropriate within a written assignment. This constitutes both unprofessional practice and failure to uphold the NMC Code and HCPC standards.
- 5.4. It is recognised that students may be unsure as to whether to raise a concern or not, or otherwise find it difficult to report their concerns or be unsure about the procedure. If they require advice or support at any stage, they can seek support from their Module Tutor, Personal Tutor or Academic Assessor.
- 5.5. Students may be concerned that they will have to return to their placement after they raised concerns about a practice. Wherever possible, and with support from the University and placement, LTU would encourage this and would expect that students will be treated fairly and included as part of the team. However, should there be any signs of negative behaviour towards students, LTU will remove them from the practice area and provide them with an alternative placement. LTU will also raise concerns with the specific placement's Educational Lead if this occurs.
- 5.6. If the concern raised affects the quality of student's educational experience, LTU will consider withdrawing the individual and possibly all LTU students from that placement and find an appropriate alternative practice learning experience. LTU will notify and discuss actions with the placement provider organisation and notify other universities who have students on that placement. Part of the role of further investigation of concerns is to allow action plans to be developed to support the clinical/practice learning environment. LTU will contribute to further investigation of concerns, action plan development and ongoing support to develop the clinical

learning environment. In most cases, students can continue to be placed in these areas with ongoing support, monitoring and evaluation of the environment through partnership working between placement provider and university. In extreme cases the placement may need to be temporarily withdrawn from the circuit. An example of this may be where a CQC report has highlighted concerns or a sudden change in staffing and resource levels may mean that students are insufficiently supported in practice.

- 5.7. Where it is deemed necessary an Exceptional Report should be made to the relevant professional organisation: PSRB, NMC, HCPC and HEE
- 5.8. The University is aware that students may not always feel comfortable reporting a concern directly to the University. Therefore, students can contact the University's Freedom to Speak Up Guardian who will be available to support Students and report incidents as required. The Freedom to Speak Up Guardian can be contacted here: [fts@leedstrinity.ac.uk](mailto:fts@leedstrinity.ac.uk)

## 6. Reporting Procedure

- 6.1. The below procedure relates to events or circumstances where there is no immediate risk of harm. For cases where there is an immediate risk of harm, students or staff should follow section 7 of this policy and procedure, detailed below.
- 6.2. Where there is not an immediate risk of harm to another person, students should raise a concern with the practice mentor/work-based supervisor/assessor/manager/educator within 3 working days of the incident occurring. Any concerns should also be raised to the senior academic staff member supporting the setting.
- 6.3. Placement Setting Staff should report any concerns to LTU Supervisor.
- 6.4. The Student or Placement Setting Staff should complete Section 1 and 2 of the Raising and Escalating Report Form available here as soon as possible and at least within 3 working days of incident/event occurring. Once completed, the form should be sent to Student Casework Team at [Studentconduct@leedstrinity.ac.uk](mailto:Studentconduct@leedstrinity.ac.uk).
- 6.5. Examples of non-immediate risk are:
  - If someone indicates they are unhappy with their care or treatment.
  - If there is a danger or risk to health and safety, such as where health and safety rules or guidelines have been broken, but this danger or risk is not imminent or immediate.
  - Issues to do with staff conduct, such as unprofessional attitudes or behaviour, including concerns related to equality and diversity.
  - Issues to do with delivering care involving nurses, midwives, nursing associates or other staff members.
  - Issues to do with care in general, such as concerns over resources, products, people, staffing or the organisation as a whole.
  - Issues to do with the health of a colleague, which may affect their ability to practise safely, but where such issues are not imminent or immediate.

- Misuse or unavailability of clinical equipment, including a lack of adequate training.
  - Financial malpractice, including criminal acts and fraud.
- 6.6. Upon receiving the form, the Student Casework Team will discuss the case with the Programme Leader/Academic Assessor. There will be three possible outcomes:
- 6.6.1 The concern does not fall within the scope of this procedure. No further action is required and the student should be debriefed by their Academic Assessor.
- 6.6.2 The concern falls within the scope of this procedure but there is no obligation for the student to make a formal report. This may be, for example, where the concern is limited to the personal experience of the student and there is no risk of harm to other individuals. The student should be advised that there is no obligation to report but if they wish to make an anonymous report, there may be limitations on the extent to which it can be investigated.
- 6.6.3 The concern falls within the scope of this procedure and the student is under an obligation to make a formal report.
- 6.7. If the concern falls within the scope of this procedure, the Programme Leader/Academic Assessor will send the reporting form to the Placement Provider to investigate the concern. They are required to complete Section 3 of the Reporting Form within 5 working days to provide an initial response and indicate a set of actions.
- 6.8. The student should be advised of the following:
- 6.8.1 That the Placement Provider may need to interview the student as part of their own investigation process and that the student should make themselves available for this.
- 6.8.2 That the student should keep a written record of the details of their concerns and who they have raised it with, whether verbally or in writing and on what date, maintaining confidentiality.
- 6.8.3 That the student may contact Leeds Students' Union for independent advice. Where a student is also a member of staff at the placement organisation, they should be advised that they can contact their trade union representative. The student may also be referred to the University's Student Support and Wellbeing Teams.
- 6.9. Upon completion of the investigation, the Placement Provider should update Section 3 of the Reporting Form, within 15 working days of the initial response being provided. This completed form will be sent to [studentconduct@leedstrinity.ac.uk](mailto:studentconduct@leedstrinity.ac.uk) and the Academic Assessor.
- 6.10. Once the completed form has been received, the Student Casework Team and Academic Assessor will update the student of the outcome of the investigation.
- 6.11. The Student Casework Team will keep a copy of the completed form and any other relevant documentation and will keep a record of the case centrally. The Student

Casework Team will retain records of cases for a period lasting no longer than the time of the students' registration at the University, plus eight years.

## 7. Emergency Reporting

- 7.1. Urgent reports, including those made outside of normal working hours, should be made in line with the University's emergency procedures. An example of where such a report is where a student believes that a person is at risk of harm if such a report is not made immediately, or where any harm already caused or experienced may be increased if there is a delay in reporting.
- 7.2. This will include immediate safeguarding concerns as defined in the University's or practice learning provider's safeguarding policies and procedures.
- 7.3. Where a student needs to make an urgent report to the University outside of University opening hours or the practice learning provider requires urgent advice or information from the University, the student or practice learning provider should contact the University via the following routes:

Security Out of Hours: 07860 383434  
Email: [studentsupport@leedstrinity.ac.uk](mailto:studentsupport@leedstrinity.ac.uk)  
Student Support: 07458 109288  
Online Chat: [MyLTU](#)

Student Support Hours:  
Monday to Friday, 9:00am - 5:00am  
Saturday to Sunday, 12:00pm - 5:00am  
Phone/Text: 12:00pm - 5:00am

- 7.4. They should also report this to the senior academic staff member supporting the practice setting via email, whose detail will be provided to the student at the beginning of each academic year. A response will be provided at the earliest opportunity.
- 7.5. Once an urgent report has been made, the Student or Placement Setting Staff should complete Section 1 and 2 of the Raising and Escalating Report Form available here as soon as possible and at least within 3 working days of incident/event occurring. Once completed, the form should be sent to Student Casework Team at [Studentconduct@leedstrinity.ac.uk](mailto:Studentconduct@leedstrinity.ac.uk).
- 7.6. Upon receiving the form, the Student Casework Team will discuss the case with the Programme Leader/Academic Assessor. There will be three possible outcomes:
- 7.6.1 The concern does not fall within the scope of this procedure. No further action is required and the student should be debriefed by their Academic Assessor.
- 7.6.2 The concern falls within the scope of this procedure but there is no obligation for the student to make a formal report. This may be, for example, where the concern is limited to the personal experience of the student and there is no risk of harm to other individuals. The student should be advised that there is no obligation to report but if they wish to make an anonymous report, there may be limitations on the extent to which it can be investigated.



7.6.3 The concern falls within the scope of this procedure and the student is under an obligation to make a formal report.

7.7. If the concern falls within the scope of this procedure, the Programme Leader/Academic Assessor will send the reporting form to the Placement Provider to investigate the concern. They are required to complete Section 3 of the Reporting Form within 5 working days to provide an initial response and indicate a set of actions.

7.8. The student should be advised of the following:

7.8.1 That the Placement Provider may need to interview the student as part of their own investigation process and that the student should make themselves available for this.

7.8.2 That the student should keep a written record of the details of their concerns and who they have raised it with, whether verbally or in writing and on what date, maintaining confidentiality.

7.8.3 That the student may contact Leeds Trinity Students' Union for independent advice. Where a student is also a member of staff at the placement organisation, they should be advised that they can contact their trade union representative. The student may also be referred to the University's Student Support and Wellbeing Teams.

7.9. Upon completion of the investigation, the Placement Provider should update Section 3 of the Reporting Form, within 15 working days of the initial response being provided. This completed form will be sent to [studentconduct@leedstrinity.ac.uk](mailto:studentconduct@leedstrinity.ac.uk) and the Academic Assessor.

7.10. Once the completed form has been received, the Student Casework Team and Academic Assessor will update the student of the outcome of the investigation.

7.11. The Student Casework Team will keep a copy of the completed form and any other relevant documentation and will keep a record of the case centrally. The Student Casework Team will retain records of cases for a period lasting no longer than the time of the students' registration at the University, plus eight years.

## **8. Concern raised to Placement Provider**

8.1. The University is aware that some Placement Providers may have their own Raising and Escalating Concerns Procedures.

8.2. Students may raise concerns through their Placement Provider's Raising and Escalating Concerns, however, students are required to also complaint the University's Raising and Escalating Concerns Form as soon as possible within 3 working days.

8.3. Students should follow the processes described above in Section 6 or 7, dependent on the urgency of the concern.

## 9. Key Contacts and Responsibilities

- 9.1. Student Casework Team – [studentconduct@leedstrinity.ac.uk](mailto:studentconduct@leedstrinity.ac.uk)
- 9.2. Student Support – [StudentSupport@leedstrinity.ac.uk](mailto:StudentSupport@leedstrinity.ac.uk)
- 9.3. LTSU Advice Coordinator – [SUadvice@leedstrinity.ac.uk](mailto:SUadvice@leedstrinity.ac.uk)