

Speaking Up Policy (GP51)

TRUST-WIDE NON-CLINICAL POLICY DOCUMENT

Document detail	
Policy Number	GP51
Version	Version 7
Approved by	Quality & Safety Committee
Effective from	07/2026
Date of last review	07/2026
Date of next review	07/2029
Lead Director	Chief Nurse
Responsible Lead	Freedom To Speak up Guardian
Superseded documents	Speaking Up Policy Version 6
Document summary	Provides guidance and support for staff on how to raise concerns and how concerns are managed within the Trust

Document History		
Version	Comments	Approved by
1.2	New Policy (change in formatting)	January 2013 QSC
2	Policy Review (updated from MIAA review)	June 2015 QSC
3	Planned update to reflect new reporting process	March 2017 QSC
4	New name of policy and supersedes Raising Concerns policy	November 2019 QSC
5	To incorporate update from National Guardians Office	February 2023 QSC
6	Planned Policy Review and alignment to WUTH and National Policy	June 2026 QSC
7	Updates and approval	August 2026 QSC

Policy on a page

The aim of this policy is to encourage open, constructive communication between employees and their managers with the aim of providing staff with the opportunity to comment freely and constructively on issues that may cause them concern in the workplace.

We are very committed to ensuring that staff concerns are taken seriously and that investigations will be carried out where appropriate.

We are also committed to having a learning culture where although all staff are accountable for their actions, we do not wish to have a blame culture and want staff to continuously learn and improve the service we provide.

This policy has been written by the National Guardians Office (NGO). The NGO policy is provided to ensure a consistent approach to Speaking Up across all healthcare settings.

LINKS TO OTHER POLICIES

HRP01 – Disciplinary Policy

HRP02 – Grievances and Resolution Policy Toolkit

HRP04 – Respect and Civility Policy (Anti Bullying and Harassment)

HRP0X – Fraud, Bribery & Corruption Policy

SUPPORTING STATEMENTS

This document should be read in conjunction with the following statements:

SAFEGUARDING IS EVERYBODY'S BUSINESS

All Wirral Community Health & Care NHS Foundation Trust employees have a statutory duty to safeguard and promote the welfare of children and adults, including:

- being alert to the possibility of child/adult abuse and neglect through their observation of abuse, or by professional judgement made as a result of information gathered about the child/adult;
- knowing how to deal with a disclosure or allegation of child/adult abuse;
- undertaking training as appropriate for their role and keeping themselves updated;
- being aware of and following the local policies and procedures they need to follow if they have a child/adult concern;
- ensuring appropriate advice and support is accessed either from managers, *Safeguarding Ambassadors* or the trust's safeguarding team;
- participating in multi-agency working to safeguard the child or adult (if appropriate to your role; ensuring contemporaneous records are kept at all times and record keeping is in strict adherence to Wirral Community Health & Care NHS Foundation Trust policy and procedures and professional guidelines. Roles, responsibilities and accountabilities, will differ depending on the post you hold within the organization;
- ensuring that all staff and their managers discuss and record any safeguarding issues that arise at each supervision session.

EQUALITY AND HUMAN RIGHTS

Wirral Community Health & Care NHS Foundation Trust recognizes that some sections of society experience prejudice and discrimination. The Equality Act 2010 specifically recognizes the protected characteristics of age, disability, gender, reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act also requires public authorities to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership.

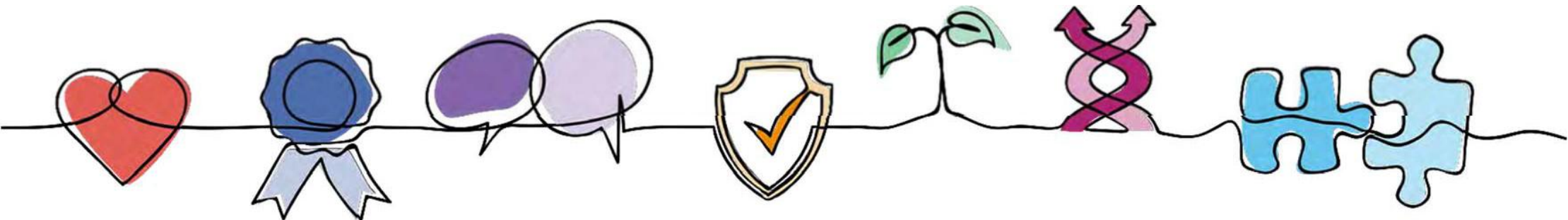
The trust is committed to equality of opportunity and anti-discriminatory practice both in the provision of services and in our role as a major employer. The trust believes that all people have the right to be treated with dignity and respect and is committed to the elimination of unfair and unlawful discriminatory practices.

Wirral Community Health & Care NHS Foundation Trust also is aware of its legal duties under the Human Rights Act 1998. Section 6 of the Human Rights Act requires all public authorities to uphold and promote Human Rights in everything they do. It is unlawful for a public authority to perform any act which contravenes the Human Rights Act.

Wirral Community Health & Care NHS Foundation Trust is committed to carrying out its functions and service delivery in line with a Human Rights based approach and the FREDA principles of **Fairness, Respect, Equality Dignity and Autonomy**

Freedom to Speak Up policy for the NHS

Version 2, December 2022



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Equality and Health Inequalities Statement

Promoting equality and addressing health inequalities are at the heart of NHS England's values. Throughout the development of the policies and processes cited in this document, we have:

- Given due regard to the need to eliminate discrimination, harassment and victimization, to advance equality of opportunity, and to foster good relations between people who share a relevant protected characteristics (as cited under the Equality Act 2010) and those who do not share it; and
- Given regard to the need to reduce inequalities between patients in access to, and outcomes from healthcare services and to ensure services are provided in an integrated way where this might reduce health inequalities.

Speak up – we will listen

We welcome 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.

This policy is for all our workers. 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”.

We want 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.

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

Online training on speaking up is available to all workers via ESR. The online module on listening up is specifically for managers to complete and the module on following up is for senior leaders to complete.

You can find out more about what Freedom to Speak Up (FTSU) is by visiting staffzone and searching FTSU

This 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.

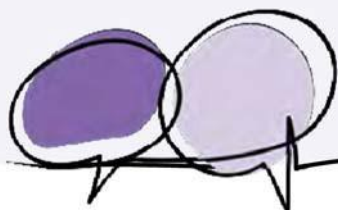


What can I speak up about?

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; or you feel the behaviours of others is affecting your wellbeing, or that of your colleagues or patients.

Speaking up is about all of these things.

Speaking up, therefore, captures a range of issues, some of which may be appropriate for other existing processes for example, HR or patient safety/quality. That’s fine. As an organisation, we will listen and work with you to identify the most appropriate way of responding to the issue you raise.



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 in NHS healthcare, including pharmacy, optometry and dentistry. This encompasses any healthcare professionals, non-clinical workers, receptionists, directors, managers, contractors, volunteers, students, trainees, junior doctors, locum, bank and agency workers and former workers.

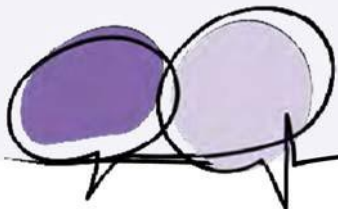
Who can I speak up to?

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.

- Senior manager or director with responsibility for the subject matter you are speaking up about.
- The Quality and Governance Team (where concerns relate to patient safety or wider quality)
- Our Freedom to Speak Up Guardian (wchc.guardian@nhs.net), 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. We also have a number of FTSU Champions who work across the Trust, within their work areas, promoting the importance of speaking up and signposting staff to support options available. You can find out more about the guardian and champions role and contact details on staff zone by searching FTSU
- Our HR team
- Staff side/Trade Union
- Our senior lead responsible for Freedom to Speak Up - they provide senior support for our speaking-up guardian and are responsible for reviewing the effectiveness of our FTSU arrangements.
- Our non-executive director responsible for Freedom to Speak Up – this role is specific to organisations with boards and can provides more independent support for the guardian; provide a fresh pair of eyes to ensure that investigations are conducted with rigor; and help escalate issues, where needed.



Speaking up externally

If you do not want to speak up to someone within your organisation, you can speak up externally to:

- The Care Quality Commission (CQC) for quality and safety concerns about the services it regulates – visit the [CQC website](#) to find out more about how the CQC handles concerns
- **NHS England** for concerns about:
 - GP surgeries
 - dental practices
 - optometrists
 - pharmacies
 - how NHS trusts and foundation trusts are being run (this includes ambulance trusts and community and mental health trusts)
 - NHS procurement and patient choice
 - the national tariff.

NHS England may decide to investigate your concern themselves, ask your employer or another appropriate organisation to investigate (usually with their oversight) and/or use the information you provide to inform their oversight of the relevant organization. The precise action they take will depend on the nature of your 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.

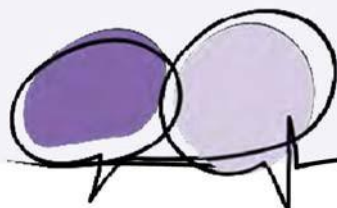


Fraud (or suspicion of fraud)

Where Fraud is suspected, the individual concerned should contact the Trust's Counter Fraud Specialist Karen McArdle (Email: karen.mcardle@miaa.nhs.uk, Tel: 0151 285 4500 or 07774 332881) or alternatively you can contact [NHS Counter Fraud Authority](#) for concerns about fraud, bribery 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'.



How should I speak up?

You can speak up to any of the people or organisations listed above in person, by phone or in writing (including email).

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 or 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.

Advice and support

You can find out about the local support available to you via the wellbeing section of the Staff Zone. The Trust's staff network groups can be a valuable source of support or contact the FTSU Guardian to discuss support available

You can also access a range of health and wellbeing support via NHS England's website



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 A.

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). It will reach a conclusion within a reasonable timescale (which we will notify you of), and feedback will be provided 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

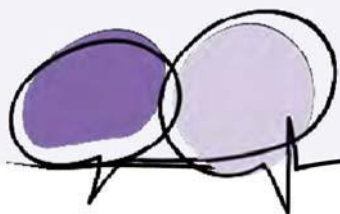
We want speaking up to improve the services we provide for patients and the environment our staff work in. Where it identifies improvements that can be made, we will ensure necessary changes are made and are working effectively. Lessons will be shared with teams across the organisation, or more widely, 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 changes made as appropriate.

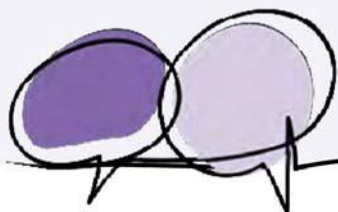
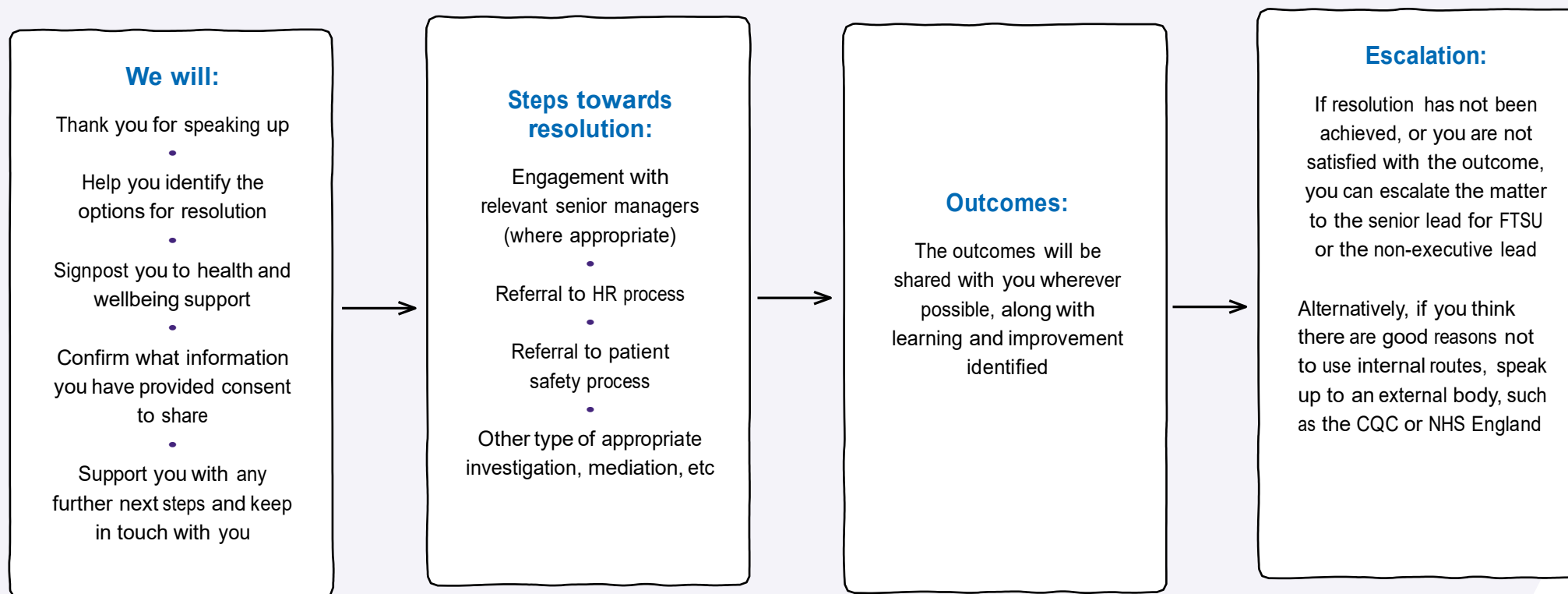
Senior leaders' oversight

Our most senior leaders will receive a report twice a year providing a thematic overview of speaking up by our staff to our FTSU guardian



Appendix A:

What will happen when I speak up?

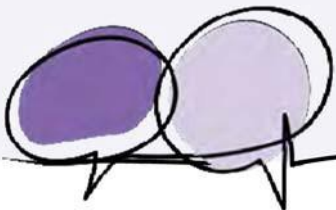


Appendix B:

Making a protected disclosure

Making a 'protected disclosure'

A protected disclosure is defined in the Public Interest Disclosure Act 1998. This legislation allows certain categories of worker to lodge a claim for compensation with an employment tribunal if they suffer as a result of speaking up. The legislation is complex and to qualify for protection under it, very specific criteria must be met in relation to who is speaking up, about what and to whom. To help you consider whether you might meet these criteria, please seek independent advice from the [Protect](#) or a legal representative.



QEIA template

A QEIA must be completed by a clinician or relevant professional for all projects that will result in one or more of the following: Change to skill mix and/or headcount, Service redesign, Change to business process that will directly or indirectly impact quality (safety, patient/service user experience and effectiveness of care). This includes back office and support service, estates relocations or Income generation where they are to be provided within existing resources.

The focus of the EQIA must always be on any quality impacts i.e. patient/service user safety, effectiveness/ clinical outcomes or patient/service user experience. This includes potential direct or indirect impact as a result of issues arising from service changes, including workforce capability and capacity, changes to service specification/ model, estate/accommodation issues. The QEIA must ensure that quality impacts, risks and associated controls have been properly identified.

Quality, Equality and Health Inequality Impact Assessment – Stage 2			
Please complete all sections			
Project Name:	Updates required to Speaking Up Policy (GP 51)		
Name of Service:	Organisation Wide	Date of assessment:	June 2026
Change start date	July 2026	End date (if applicable)	July 2029
Project brief description: Aims and Objectives E.g. What is the project going to deliver, change or achieve?	Update and refresh of existing policy in line with the Speaking Up policy produced by the National Guardians Office which is recommended to be adopted by all Trusts		
Background - What is the rationale for implementing this project? E.g. What are the current challenges that have resulted in this project / initiative?	The National Guardians office produced a template policy to standardise Speaking Up policies in all Trusts		
Summary information of the service / policy / function being assessed:	To provide guidance and support for staff on how to raise concerns and how concerns are managed within the Trust and to be in line with National guidance on Speaking Up		

Aims and objectives of service / policy / function:	The aim of this policy is to encourage open, constructive communication between employees and their managers with the aim of providing staff with the opportunity to comment freely and constructively on issues that may cause them concern in the workplace. We are very committed to ensuring that staff concerns are taken seriously and that investigations will be carried out where appropriate. We are also committed to having a learning culture where although all staff are accountable for their actions, we do not wish to have a blame culture and want staff to continuously learn and improve the service we provide.
If this assessment relates to a review / current service or policy, what are the main changes proposed and reason why:	Updated to use the National Guardians Office policy
What engagement work is planned / or carried out and how will you involve people from equality groups to ensure that their views inform decision making:	This policy will be shared with all staff network groups. There are Freedom To Speak Up Champions who are members of all staff network groups and they have had chance to input into this policy. The Trusts Head of Inclusion & Inequalities is also a Freedom To Speak Up Champion and supports all staff from equality groups to raise concerns under this policy
Does the proposal or change help to reduce health inequalities and how? YES / NO If yes, please summarise these:	Yes. This policy is for all staff and outlines how staff from all backgrounds can be supported to speak up and be treated fairly if raising a concern

Does the proposal relate to impacts due to COVID-19? YES / NO If yes, please summarise these:	No.	
Senior Responsible Officer	FTSU Guardian/ Chief Nurse	
Project Lead	Freedom To Speak Up Guardian	
Clinical, Professional or Corporate Lead	Freedom To Speak Up Guardian	
Who Will the Change Affect? Please provide detail in the last column on how it will affect this group of stakeholders Please answer: YES, NO or Indirectly/Possibly	Public	Indirectly
	Patient/service users/carers/families	Indirectly
	Partner agencies	No
	Staff	Yes
	Other... please give detail	

No	Quality Impact to Consider	Description of Quality Impact	Positive impact	Neutral impact	Negative impact	Likelihood	Consequence	Negative Impact Score	Mitigation Plan for negative impact	Impact measures for all levels of impact (S.M.A.R.T)
1.	What will the Impact be on patient/service user experience?	Staff who feel able to openly raise concerns will have a positive impact on service user experience	✓							
2.	What will the Impact be on our workforce?	Protecting the psychological safety of our staff. Staff feeling supported and confident to raise concerns in the knowledge that concerns will be investigated, they will be thanked and receive feedback. Feeling safe in the knowledge there will be no detriment to raising concerns and concerns are seen as a learning opportunity to support the safety and wellbeing of staff and service users	✓							
3.	What will the Impact be on patient/service user Safety?	Staff who feel able to openly raise concerns will have a positive impact on service user safety. Any concerns relating to the safety of service users will be investigated and if there are gaps actions will be put in place to rectify	✓							

No	Quality Impact to Consider	Description of Quality Impact	Positive impact	Neutral impact	Negative impact	Likelihood	Consequence	Negative Impact Score	Mitigation Plan for negative impact	Impact measures for all levels of impact (S.M.A.R.T)
4.	What will the Impact be on Clinical Effectiveness?	As above	✓							
5.	What will the impact be on the system?	If applicable cross organisational working with other Trusts to address concerns	✓							

Approval activity

Service Director Name and signature		Date	
Chief Nurse Approval		Date	
Medical Director Approval		Date	
Monitoring Group	Quality and Safety Committee		

Evidence section			
What evidence have you considered within this assessment? (this can include NICE / research / engagement work / demographics / service data)			
Policy issues by National Guardians Office			
If this assessment relates to a policy / strategy, has an equality statement been added or planned to be added?			Yes
If no, please state why not:			
IMPACT ASSESSMENT:			
This section should record any known or potential impacts on equality groups and other groups at risk of poorer health outcomes. Impacts may be both negative and positive. Think about barriers to access and how different groups may be disproportionately impacted. You can copy and paste this tick: ✓			
Age	Positive effect	Neutral	Negative effect
	✓		
Explanation: Policy applicable to all staff members regardless of age and could actively support a staff member if they felt they were being discriminated against			

Disability	Positive effect	Neutral	Negative effect
	✓		
Explanation: Policy applicable to all staff members regardless of any disability and could actively support a staff member if they felt they were being discriminated against			
Sexual Orientation	Positive effect	Neutral	Negative effect
	✓		
Explanation: Policy applicable to all staff members regardless of sexual orientation and could actively support a staff member if they felt they were being discriminated against			
Gender Reassignment	Positive effect	Neutral	Negative effect
	✓		
Explanation: Policy applicable to all staff members regardless of gender or any gender reassignment and could actively support a staff member if they felt they were being discriminated against			
Sex	Positive effect	Neutral	Negative effect
	✓		
Explanation: Policy applicable to all staff members regardless of sex and could actively support a staff member if they felt they were being discriminated against			
Race	Positive effect	Neutral	Negative effect
	✓		
Explanation: Policy applicable to all staff members regardless of race and could actively support a staff member if they felt they were being discriminated against			

Religion and Belief	Positive effect	Neutral	Negative effect
	✓		
Explanation: Policy applicable to all staff members regardless of religion or beliefs and could actively support a staff member if they felt they were being discriminated against			
Pregnancy and Maternity	Positive effect	Neutral	Negative effect
	✓		
Explanation: Policy applicable to all staff members and could actively support a staff member if they felt they were being discriminated against			
Marriage and Civil Partnership	Positive effect	Neutral	Negative effect
	✓		
Explanation: Policy applicable to all staff members and could actively support a staff member if they felt they were being discriminated against			
Other groups at risk of poorer health outcomes:			
Carers	Positive effect	Neutral	Negative effect
	✓		
Explanation: Policy applicable to all staff members and could actively support a staff member if they felt they were being discriminated against			
Socio-economic deprivation	Positive effect	Neutral	Negative effect
	✓		
Explanation: Policy applicable to all staff members and could actively support a staff member if they felt they were being discriminated against			

Other groups e.g. Asylum Seekers, Homeless, Sex Workers, Military Veterans, Rural communities – please state	Positive effect	Neutral	Negative effect
	✓		
Explanation: This policy would support any staff members who fitted into any of the named groups and would actively support any staff member who felt they were being unfairly treated or discriminated against			
Equality Legal Duties – compliance			
Has the Trust given due regard and given consideration for the following:			
Eliminating unlawful discrimination, harassment, and victimisation <i>Unlawful discrimination takes place when people are treated ‘less favourably’ as a result of having a protected characteristic</i>		Yes	
Advancing equality of opportunity between people who share a protected characteristic and those who do not <i>Making sure that people are treated fairly and given equal access to opportunities and resources</i>		Yes	
Fostering good relations between people who share a protected characteristic and those who do not <i>Creating a cohesive and inclusive environment for all by tackling prejudice and promoting understanding of difference</i>		Yes	
Are there any potential Human Rights concerns If yes – please seek advice from the Inclusion & Health Inequalities team to discuss carrying out specific human rights assessment. wcnt.inclusion@nhs.net		No	
Compliance to the NHS Contract In relation to ServiceConditions(SC13) which includes AccessibleInformation Standard (AIS) – see staffzone for further info on AIS		Yes	

Supporting narrative to support the above responses: *This section must be completed*

Consideration to the above has been given by both Wirral Community Health and Care NHS Foundations Trust and the National Guardians Office when producing this policy

Equality Related Risk Assessment Section

If you have identified an equality risk, please use the table below to work out the risk score. If you have a score of **10** and above you should escalate to risk management procedures.

Likelihood	Almost Certain	5	5	10	15	20	25
	Likely	4	4	8	12	16	20
	Possible	3	3	6	9	12	15
	Unlikely	2	2	4	6	8	10
	Rare	1	1	2	3	4	5
			1	2	3	4	5
			Insignificant	Minor	Moderate	Major	Catastrophic
			Impact/Consequence				

If you have identified an equality risk: Risk Score = N/A
What is the consequence?
What is the likelihood?
Risk score = consequence x likelihood
Any narrative relating to risk score:

Equality Action Plan with target dates

Please include any related recommendations arising from this assessment. A target date is required for all actions

Action required	Lead person	Target date	Further comments
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N/A

Date for this assessment to be shared with governance processes: **06/2026**
(All assessments should have governance oversight)

Final Section: Approval activity

Service Director name and signature

Chief Nurse Approval

Medical Director Approval

Monitoring Group: Quality
and Safety Committee

Date received by E&I Team for assurance check:

Person completing the assessment template: Alison Jones – Freedom To Speak Up Guardian

What next?

1. Regularly review the action plan and update the QEIA accordingly
2. Send copy of approved form to wcnt.communications@nhs.net to be uploaded to staffzone
3. Save a finalised copy for your records and share with your Divisional SAFE meeting and the E&I Team and upload to SAFE
4. Follow any internal advice from the E&I Team

MONITORING TOOL

Minimum requirement to be monitored	Process for monitoring	Responsibility for completion	Frequency of Monitoring	Responsibility for Development of Action Plans	Responsibility for Review of Results / Outcomes
- Number of staff raising a concern - Nature of concerns raised - Learning from concerns raised	Review of number of Concerns reported under the Raising Concerns Policy and outcomes	FTSU Guardian/ Chief Nurse	Quarterly	FTSU Team	Quality and Safety Committee
- Number of staff raising a concern - Themes of concerns raised - Learning from concerns raised	Review of number of Concerns reported under the Raising Concerns Policy and outcomes	FTSU Guardian/ Chief Nurse	Bi-Annually	FTSU Team	Public Board