

## Institute of Health

### Policy for Raising and Escalating Concerns in relation to Safeguarding Vulnerable Adults, Children and Young People

<b>POLICY SCHEDULE</b>	
Policy title	Raising and Escalating Concerns in relation to Safeguarding Vulnerable Adults, Children and Young People
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***NB. This policy is available on the University of Cumbria website, and it should be noted that any printed copies are uncontrolled and cannot be guaranteed to constitute the current version. of the policy.***

## Contents

<b>Subject</b>	<b>Page No</b>
<a href="#"><u>Scope and introduction</u></a>	3
<a href="#"><u>Detailed guidance – how to raise a concern and to who</u></a>	5
<a href="#"><u>Rationale and Process- What happens when you raise a concern:</u></a>	7
<ul style="list-style-type: none"><li>• Writing a statement</li><li>• What happens to my statement?</li><li>• What happens next?</li></ul>	
<a href="#"><u>Further reading and guidance</u></a>	10
<ul style="list-style-type: none"><li>• Useful web links</li></ul>	

## **Scope**

Any student or apprentice who is studying on a professionally regulated programme which includes a practice based/placement element:

Nursing (all fields)  
Nursing Associate  
District Nursing/Community Learning Disability Nursing  
Midwifery  
Diagnostic Radiography  
Ultrasound  
Paramedic programmes  
Physiotherapy  
Occupational Therapy  
Social Work  
Psychology  
Counselling  
Children, families, and youth work  
Sport

## **Introduction**

Practice based/placement areas provide excellent learning environments for our students/apprentices and always endeavour to deliver very high standards of care to patients, clients, service users/people with lived experiences. However, from time to time, there may seem to be a problem in a placement area where you may witness an incident or poor practice that is of concern to you.

This policy will set out the procedures to follow should this occur.

This policy and procedures within should also be followed if:

- you are subject to any form of abuse or inappropriate behaviour.
- you are the subject of any complaint about your behaviour in the setting.

Witnessing and reporting concerns can be distressing and difficult. However, you have a professional, ethical, and statutory responsibility to report any incidents of poor practice or concern. Professional Codes of Conduct include an expectation to act and report any concerns and as a student/apprentice on a professionally regulated programme, you are expected to uphold the values and expectations of your professional code.

On commencement of each placement, you will receive an induction which should clarify the setting's emergency and safeguarding procedures along with the local policy for raising concerns.

If these policies are not shared with you within your first week of each placement you will need to report this without delay to your practice assessor/supervisor; Practice Education Facilitator (PEF), Personal tutor and (for midwifery students/apprentices) the Lead Midwife for Education (LME).

Social work students: report to your Link Lecturer and the University Social Work Placement Lead.

You are also advised to find out who is the placement's Freedom to Speak up Guardian or 'Safeguarding Officer'. (Please see <https://nationalguardian.org.uk/> for details on Freedom to Speak Up Guardians).

It is crucial that you report any incident/concern immediately and appropriately. You should discuss it immediately with senior placement staff, the Practice Education Facilitator (PEF) and (for midwifery students)- your Professional Midwifery Advocate, but you **must always** notify your Personal Tutor or Academic Assessor and (for midwifery students) the Lead Midwife for Education - LME.

Social work students - discuss immediately with senior placement staff and notify your Link Lecturer and University Social Work Placement Lead.

The following is a list of examples that may constitute neglect or abuse and should give rise to concern and be reported:

- Physical abuse
- Domestic violence
- Sexual abuse (sexual misconduct, sexual violence)
- Child exploitation (physical, sexual criminal, including county lines)
- Psychological abuse
- Financial or material abuse
- County lines
- Modern slavery
- Discriminatory abuse
- Institutional abuse
- Neglect and acts of omission.
- Self-neglect
- Female genital mutilation
- Forced marriage and/or honor-based violence.
- Bullying and harassment
- Hate crime.

(Adapted from: Chapter 14, Care and Support Statutory Guidance: Updated 2<sup>nd</sup> Sept, 2022, issued by the Department of Health under the Care Act 2014)

<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#safeguarding-1>

The following page contains details to guide you in the process of reporting a concern and a detailed explanation of the process that takes place after reporting it.

## **Detailed Guidance: how to raise a concern.**

### **REMEMBER:**

- Take immediate and prompt action.
- Report as per the guidance below and make sure you record your concerns in writing (you may be asked to produce a statement at a later date).
- Report & record: What happened; where it happened; who was involved/witnessed and what actions were taken at the time?
- Remain objective and state the facts.

### **Remember: If in doubt – check it out**

## **Immediate Risk of Harm/Emergency Situation**

If you (as a student/apprentice) have a concern about the safety or wellbeing of adult/child/young person in the placement and/or about the quality of care provision or the placement setting: and there an immediate risk of harm/emergency situation:

- Follow the local policy for raising concerns - but be prepared to call 999 for the appropriate emergency service required.
- Report your concerns immediately without delay to the appropriate person of authority in the placement – for example the placement/ward/department manager; the shift leader and/or the person who is in charge at the time of the incident.
- Once the immediate risk of harm/emergency has been dealt with - report to the PEF, and your Personal Tutor/Academic Assessor and LME (for midwifery students). Social work students report to your Link Lecturer and University Placement Lead

### **If you are the person who is at immediate risk of harm:**

- Make yourself safe by removing yourself from the setting and take appropriate action immediately (for example contacting emergency services)
- Report to the appropriate person of authority in the placement - for example the placement/ward/department manager; the shift leader and/or the person who is in charge at the time of the incident.
- Once the immediate risk of harm/emergency has been dealt with report to the PEF, and your Personal Tutor/Academic Assessor and LME (for midwifery students). Social work students report to your Link Lecturer and University Placement Lead

## **Not immediate risk of harm/emergency situation?**

**If you (as a student/apprentice) have a concern about the safety or wellbeing of adult/child/young person in the placement and/or about the quality of care provision or placement setting and there is not an immediate risk of harm/emergency situation:**

- Speak to senior placement staff immediately - for example: the placement/ward/department manager; the shift leader and/or the person who is in charge at the time of the incident. (Please see guidance below if your concern involves any of the above individuals)
- Inform the University immediately – contact your Personal Tutor/Academic Assessor, and LME (for midwifery students). Social work students report to your Link Lecturer and University Placement Lead

**If you feel unable to raise a concern in the placement or it is the manager/the shift leader/person in charge of the setting that you are concerned about:**

- Follow the local policy for raising concerns.
- Be prepared to call 999 for the appropriate emergency service required (In the event of immediate risk of harm/emergency situation)
- Report to the Freedom to Speak Guardian/Safeguarding Lead for the placement's organisation and the Practice Education Facilitator
- Report immediately to your Personal Tutor/Academic Assessor, LME (for midwifery students). Social work students report to your Link Lecturer and University Placement Lead

**Remember:**

As a healthcare student/apprentice, but also as a member of the public, anyone can make a direct referral to one of the statutory safeguarding agencies such as: CQC; multi-agency safeguarding hub –but you must ensure you also inform the University – by contacting your Personal Tutor/Academic Assessor, Programme Leader and LME (for midwifery students); Social work students report to your Link Lecturer and University Placement Lead if this is with regards to a placement setting

- You can also log a safeguarding concern via the Student Enquiry Point: StEP: [https://uoc-advocate.symplicity.com/care\\_report/index.php/pid599900](https://uoc-advocate.symplicity.com/care_report/index.php/pid599900)

**What Happens If you are the subject of any complaint about your behaviour/conduct either in a placement setting or outside of programme activity?**

As a healthcare student/apprentice you need to:

- Immediately inform your Personal Tutor/Academic Assessor and Programme Leader – and LME (for midwifery students), Social work students report to your Link Lecturer and University Placement Lead, who will provide the required support and guidance.
- Refer to UoC Student code of Conduct: <https://my.cumbria.ac.uk/Student-Life/Support/Responding-to-your-concerns/Student-Code-of-Conduct/>

**If at any time throughout any of the above processes you do not receive a response from your Personal Tutor/Academic Assessor/Social work Link Lecturer - contact your Programme Leader or Principal Lecturer, and LME (for midwifery students). Social work students contact the University Social Work Placement Lead, who will then ensure the Head of Practice Learning & Partnership Engagement and Head of Student Services/Operational Safeguarding Lead is informed.**

**Key Points:**

- Take immediate and prompt action.
- Seek advice and support straight away from the PEF, your Personal Tutor/Academic Assessor and: LME (for student midwives), and for Social work students your Link Lecturer and University Placement Lead
- Protect patient/client confidentiality.
- Keep an accurate record of concerns, events, and dates/times as you may have to provide a factual statement.

For additional sources of support and further resources, please refer to appendix 1.

## **What happens next when you have raised a concern?**

### **Writing a statement**

You will be asked to write a statement.

This is sometimes a difficult thing to do but you will receive support and guidance from your Personal Tutor/Academic Assessor to help you. You can also get support and guidance from the Student Union. Student Midwives should also seek support from the LME. Social work students should also seek support from your Link Lecturer and University Placement Lead.

A statement request may be requested by your Personal tutor/Academic Assessor or by the placement area to support the investigation of the concern raised.

### **Good practice in statement writing:**

- Include dates and times and places.
- Name all those involved including any witnesses, and if possible, include their titles (remember to anonymize patient/client names at this point)
- Keep it factual and don't include emotive language/or opinions. You can receive help from your Personal Tutor/Academic Assessor in making sure your statement is written in the correct format.
- Describe what happened and any impact you observed, including any impact on you.
- Describe any actions that were taken at the time including by whom and any outcome.

### **What happens to my statement?**

Copies may go to the following (please note this list is not exhaustive):

- The Principal Lecturer/Lead Midwife for Education, Head of Practice Learning & Partnership Engagement. Copies may also go to the Head of Student Support as Operational Safeguarding Lead, the NMC Official Correspondent (if nursing or midwifery related) and others as appropriate (in accordance with GDPR requirements)
- The Practice Education Facilitator as appropriate
- The placement area itself will also require a copy of the statement in order for them to be able to take appropriate action to address the concerns (for example the Manager and/or professional lead)
- Other statutory and regulatory compliance bodies may also require the information (examples including, but not limited to: NMC; HCPC; Police; Social Work England; CQC; Social Services, Local Authority representatives)

### **What happens next?**

- Your concern will be acknowledged, and you will be informed of next steps.
- Your concern and statement will be received by your Programme Leader and Principal Lecturer and (if not already done) will be escalated to the University's Head of Practice Learning and Partnership Engagement (HPLPE) and Head of Student Support in their role as Operational Lead for Safeguarding – (HSS)
- You will be offered support from your Personal Tutor/Programme lead, and for social work students, your Link Lecturer and University Placement Lead. You can also seek support from the Student Union, Principal Lecturer, Lead Midwife for

Education. The Head of Practice Learning & Partnership Engagement and the Head of Student Services will also provide support if required. If you are a student/apprentice member of a union, you can also seek guidance from them.

- Student support services also provide assistance and guidance- this can be accessed directly via the Student Enquiry Point (StEP):  
[https://uoc-advocate.symplicity.com/care\\_report/index.php/pid599900](https://uoc-advocate.symplicity.com/care_report/index.php/pid599900)
- The Head of Practice Learning & Partnership Engagement and the Head of Student Support may need to seek advice from the local external agency as to whether there is a requirement for them to take over any investigation; alternatively, the external agency may ask the University to do this and report back to them as required.
- If the external agency decides there is no statutory requirement for them to investigate, then this becomes an internal University matter, and any required further investigation will take place.
- The Head of Practice Learning & Partnership Engagement, the Head of Student Support and the NMC Official Correspondent (for nursing and midwifery concerns) will lead any required investigation often in partnership with the placement area concerned.
- A joint action plan will be produced if necessary to ensure that concerns raised are dealt with swiftly and appropriately.

### **What happens if the external agency wishes to proceed with an investigation?**

- University processes will be put on hold until there is an outcome from the external investigation.
- The external agency investigation team will want to speak with you. We will arrange for this to happen at University (or via virtual 'Teams' meeting if face to face is not possible) in the presence of University of Cumbria staff e.g., your Personal Tutor, LME, NMC Official Correspondent, the Head of Practice Learning & Partnership Engagement, Head of Student Support/Operational Safeguarding Lead, Student Union representative support and anyone else you wish to accompany you. This is a supportive discussion where the external agency investigation team's role and aim is to gather facts and information.
- The investigation team will visit the placement area and conduct a thorough investigation.
- An investigation may take weeks or months to conclude; once concluded, the University should receive a letter or report; findings will be fed back to you where possible.



**What happens if there is an internal investigation within the placement area/ placement area's organisation?**

- Once your statement is received at the placement area, their internal investigation procedures may be invoked.
- If this happens, the placement area will request a copy of your written statement and they may request a meeting with you (and any other students who may have also reported concerns at the same time) to investigate.
- You must notify your personal tutor and LME (for student midwives) and for social work students your Link Lecturer and University Placement Lead, so that you can be accompanied by your Personal tutor (or Academic Assessor)/Programme Leader/LME and any other representation you wish to be present throughout e.g. professional union or students' union. You can also receive support through the whole process from a Professional Midwifery Advocate, Head of Practice Learning & Partnership Engagement, Head of Student Services/Operational Safeguarding Lead, Lead Midwife for Education, NMC Official correspondent
- If you are asked to attend further meetings, staff from the University (as noted above) will continue to support you throughout.
- You will be given time to attend any meetings and paid travel expenses where necessary.
- Findings will be fed back to you where possible.

## Appendix 1

Further reading and guidance can be found at the links below:

**University of Cumbria: Safeguarding & Prevent Advice & Guidance for Staff, Students and External Bodies:**

<https://my.cumbria.ac.uk/Student-Life/Health-and-Wellbeing/Safeguarding/>

**University of Cumbria: Safeguarding and Prevent Policy:**

<https://my.cumbria.ac.uk/media/MyCumbria/Documents/Student-services/Safeguarding-and-Prevent-Policy-2022-23.pdf>

**NMC:** [Read Raising Concerns online - The Nursing and Midwifery Council \(nmc.org.uk\)](https://www.nmc.org.uk/raising-concerns/)

**HPCPC:** [Report concerns about safety | \(hcpc-uk.org\)](https://www.hcpc-uk.org/report-concerns-about-safety/)

**Social Work England: Raise a Concern:** [Raise a concern - Social Work England](https://www.socialworkengland.org/raise-a-concern/)

**NHS Freedom to Speak Up guidance and advice:** [NHS England » Freedom to speak up](https://www.nhs.uk/healthcare-professionals/freedom-to-speak-up/)

**Department of Health & Social Care: Care and Support Statutory Guidance; Chapter 14, (Updated June 2022) issued by the Department of Health under the Care Act 2014:**

[Care and support statutory guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/care-and-support-statutory-guidance)

**The Care Quality Commission (CQC) - CQC, the independent regulator of health and social care in England:** <https://www.cqc.org.uk/> (accessed 28.02.23)

**Health Education England:** Raising and responding to concerns.

Instilling the importance of speaking up about patient safety and responding effectively.

<https://www.hee.nhs.uk/our-work/raising-responding-concerns> (accessed 28.02.23)

**Local County Councils' Safeguarding websites** offer information and guidance about safeguarding of adults and children and how to raise a concern:

In order to access this: search for:

How do I make a safeguarding referral about a vulnerable adult/adult at risk?

How do I make a safeguarding referral about a vulnerable child/child at risk?

**Lancashire:**

[Safeguarding - Lancashire County Council](https://www.lancashire.gov.uk/childrens-services/safeguarding/)

**Cumbria:**

Safeguarding Adults Board:

<https://www.cumbriasab.org.uk/>

**Cumbria:**

Safeguarding children and young people:

<https://www.cumbria.gov.uk/childrenservices/childrenandfamilies/intervention.asp>