1. BACKGROUND

1.1. Within the programmes of study there are opportunities for students and those that support them from the university and in practice settings to use different pathways to address concerns about teaching and learning or situations within practice where a student observes or identifies a situation or event, which has the potential to cause risk or harm to an individual(s) or organisation. There is a need, therefore, to identify a process for responding to concerns which supports the student and the staff that support them.

1.2. The University recognises that students on placements have a duty to report dangerous, abusive, discriminatory or exploitative behaviour and practice. It also recognises the relative powerlessness and vulnerability of students who may be undergoing a process of assessment by work-based staff during their placement. 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.

1.3. No detrimental action of any kind will be taken against a student making a complaint of the nature described above, provided that it is done without malice and in good faith. A malicious or vexatious complaint, however, could result in disciplinary action.

2. PURPOSE

The purpose of this policy is to ensure any concerns expressed by the student whilst in practice placement, are addressed consistently, effectively and appropriately. In addition, this policy will support the development of health care and social care students to fulfil their professional responsibilities as required by the Nursing and Midwifery Council and Health Professions Council when registered.

3. OTHER RELATED DOCUMENTS

Faculty of Health Social Care and Education (2009) Mentor and Practice Teacher Handbook Faculty of Health, Social Care and Education, Kingston University and St George’s, University of London
Health Professions Council (2012) *The fitness to practise process; information for employers and managers*, HCPC

Health Professions Council (2012) *How to raise a concern*, HCPC


**Nursing and Midwifery Council (2013) Raising Concerns: Guidance for nurses and midwives*, NMC: London

4. **WHEN**

This policy applies throughout a student’s education programme when engaged in practice, but issues may be reported at anytime during their programme.

**N.B.** If the student has witnessed or suspects that there is a risk of immediate harm to a person in their care, they should report their concerns to the appropriate person or authority without delay (NMC, 2013; HCPC 2012). If the student chooses to report their concern to a member of academic staff, the academic staff member must inform the relevant senior person in the organisation (e.g. Trust Named Person) without delay.

5. **WHO**

5.1. **The Student:** As a developing professional the student is responsible for raising concerns where they observe or identify a situation or event, which has the potential to cause risk or harm to an individual(s) or organisation, or any factor known to them which they believe will impede their performance in practice.

5.2. **The Mentor/Work-based Supervisor/Educator:** As a registered health care or social work professional, the mentor/work-based supervisor/educator is responsible for raising concerns where they observe or identify a situation or event, which has the potential to cause risk or harm to an individual(s) or organisation, or any factor known to them which they believe will impede a student’s performance or progression in practice.

5.3. **The academic staff member supporting practice** This includes the Liaison Lecturer/Liaison Lecturer (Midwifery)/Learning Team Tutor. As a registered health care/social work professional they are responsible for acting on concerns raised by students which has the potential to cause risk or harm to an individual(s) or organisation, or the student’s educational experience. They are the first point of contact for the student within the School when raising concerns about issues in practice settings. The expectation is that they will, where possible, address these concerns in the practice placement with the mentor/educator/manager as appropriate.

5.4. **The senior academic staff member supporting practice:** This includes the Key Liaison Lecturer/Liaison Lecturer (Midwifery) Senior Lecturer in Practice Education/ Senior Lecturer/Practice Learning Manager. As a registered health care/social work professional they are responsible for addressing concerns expressed by students which have the potential to cause risk or harm to an individual(s) or organisation or the student’s educational experience. In addition, they are responsible for following up any issues raised with the relevant senior person in the organisation and in the university.
5.5. **Personal Tutor/Learning Team Tutor**: As a registered healthcare/social work professional they are responsible for ensuring appropriate pastoral support is in place for the student.

5.6. **Programme Leader/Course Director**: As a registered healthcare/social work professional they are responsible for ensuring the quality of the relevant pre-registration programme.

5.7. **Relevant Senior Person in Practice**: e.g. Trust Named Person, Head of Department, Senior Manager/Education Lead in organisation, Supervisor of Midwives.

6. **WHAT**

6.1. A **concern** relates to an issue, wrongdoing or risk, which affects others. (See section 7).

6.2. A **complaint** relates to an issue where a student is complaining about how they have personally been treated whilst on a practice learning experience and are seeking resolution for them self. (See section 9)

7. **HOW**

7.1. In the first instance, all students with concerns should raise them with their placement mentor/work-based supervisor manager/educator.

7.2. If the concerns are of a nature that the student needs further support, the student should seek support from the Liaison Lecturer/Learning Team Tutor. The student may also wish to seek pastoral support from their Personal Tutor/Learning Team Tutors.

7.3. Where the student is an employee of the placement provider (e.g. seconded or 2nd Registration Student or Employment-Based Route (EBR) Students) and the incident occurs in their seconding organisation they must follow their own organisation whistle blowing/raising concerns policy but will also be expected to inform the senior academic staff member supporting practice.

7.4. If the student feels unable to raise the matter locally for any reason their concern should be raised with the senior academic staff member supporting practice with two possible outcomes:

7.4.1. No further action is required and student debriefed
7.4.2. Concerns are valid and decision made to take the matter further

7.5. If the decision is made to take the matter further, the senior academic staff member supporting practice informs the Programme Leader/Course Director.

7.6. If the student and Programme Leader/Course Director believe the matter requires further attention and the student wishes to raise their concerns formally, s/he must be provided with information about the procedure including:

7.6.1. The student is advised about the possible consequences of making a formal complaint including that the organisation will wish to interview the student as part of their own process in investigating the concern raised and that the student should make them self available for this.

7.6.2. The requirement for a written statement (see 7.8).

7.6.3. If the student wishes their concern to remain anonymous the limitations this puts on investigating the concern further must be discussed with the student.

7.6.4. If appropriate the student is advised to contact her/his union representative at this stage. The student may also require counselling support.

7.7. The Programme Leader/Course Director should make a record of this conversation and notify the relevant senior person in the organisation which would include the Director of
Students Raising Concerns in Practice

Nursing/Midwifery equivalent senior person for Allied Health Professions and Social Work, the senior academic staff member supporting practice and Head of relevant pre-registration Programme. **N.B.** At this point a decision will also be made whether to withdraw the student/all students from the placement area concerned following discussion with the senior person in practice. See Process for Managing Concerns Related to the Quality of Practice Learning Environment.

7.8. The student must write a formal statement of the observed events within two university working days of the organisation being informed. The statement should provide a record of the observed conduct, and include essential information: date, time and location of the event, who was involved, the conduct observed, whether there were any witnesses to the incident. It is advantageous if the statement is signed by the student and if others are willing to put their names to the statement. However if the student wishes to remain anonymous the University will not disclose their identity without their consent.

7.8.1 Support in writing the statement will be provided to the student by the relevant member of staff linked to the area of practice or the programme Leader/Course Director or a delegated other.

7.9. The statement will be forwarded by the senior academic staff member supporting practice to the Director of Midwifery (if related to midwifery practice) or the relevant senior person in practice (see 5.7) and the Director of Nursing or the equivalent for Allied Health Professionals and Social Work and to the Head of Programmes for the relevant pre-registration programme.

7.10. The relevant senior person in practice (see 5.7) will monitor the progress of the concern/complaint.

7.11. Following completion of the investigation by the placement provider organisation, all relevant stakeholders will be informed of the summary of key concerns and outcomes and key learning for the organisation and/or University. The stakeholders will include the student, Placement Staff, senior academic staff member supporting practice, Programme Leader/Course Director, Head of Programmes, relevant Senior Person in Practice and the Director of Nursing/Midwifery or equivalent for Allied Health Professionals and Social Work in the organisation.

7.11.1 The full investigative report will be held internally. The Director of Nursing/Senior Person in practice will discuss with the Head of Programmes the appropriateness of sharing details of the full report in exceptional circumstances with stakeholders.

7.12. If a representative of a placement provider wishes to interview the student, permission MUST be sought from the Head of Programme/Course Director at the University.

7.13. For students who are employees of a health or social care organisation (e.g. seconded or 2nd Registration Student/Employment-Based route Students):

7.13.1. if the incident occurs within the student’s employing organisation, the employing organisation does not need to seek permission from the University but should seek permission from the student’s line manager in the organisation and must also inform the student’s programme leader.

7.13.2. if the incident occurs outside the student’s employing organisation, the employing organisation needs to seek permission from the student’s line manager and must inform the student’s programme leader.
8. Out of Hours Management

Where a student has a concern that occurs outside of university opening hours that cannot be raised locally, the student should contact the Site Management Team/Senior Manager on call to discuss the issue of concern. Where advice/information is required by the organisation from the university an email should be sent to the senior academic staff member supporting practice with the Programme Leader/Course Director and Head of Programmes for the relevant pre-registration programme copied in. A response will be provided on the next working day.

9. Making a complaint

The difference between raising a concern and making a complaint

9.1. A concern is where a person is worried generally about an issue, wrongdoing or risk, which affects others. The person is acting as a witness to what they have observed, or to risks that have been reported to them and are taking steps to draw attention to the situation, which could adversely affect those in their care, staff or the organisation.

9.2. A complaint is about how a student may feel personally that they have been treated at on placement such as perceived poor mentorship/supervisor/educator support and are seeking resolution for themselves. In these circumstances, the student should raise their concerns with their mentor/placement manager in the first instance or their Liaison Lecturer/Learning Team Tutor.

10. Process for responding to a student complaint (in a practice setting)

10.1 If the issue cannot be resolved through a discussion with the mentor/manager and student, the Liaison Lecturer will meet with the student and mentor/educator/work-based supervisor to discuss the complaint being made. Following this meeting the Liaison Lecturer/Learning Team Tutor may identify one of the following actions:

10.1.1. The complaint has been addressed, no further action is necessary. The issue is noted in the student’s file.

10.1.2. The complaint has been addressed; however, further support to both mentor/work-based supervisor/educator and student on this issue is needed and will be provided by the Liaison Lecturer/Senior Lecturer for Practice Education/Senior Lecturer/Practice Learning Manager and then reviewed. The issue is noted in the student’s file.

10.1.3. The complaint has not been addressed. The Liaison Lecturer/Learning Team Tutor Senior Lecturer/Practice Learning Manager will inform the senior academic staff member supporting practice who will arrange a meeting with the Senior Person in the organisation responsible for Practice Education and record it in the student’s file.

10.1.4. Where the complaint still has not been addressed. In the face of continuing concerns from a student, the student and/or Liaison Lecturer/Senior Lecturer in Practice Education/Senior Lecturer/Practice Learning Manager may address the issues directly with the Head of Programmes (to relevant pre-registration programme) or Head of School who will agree actions to take this forward. This may only be done upon evidence being given by the student or Liaison Lecturer/Learning Team Tutor of prior steps of attempts at resolution having taken place, specifically meetings with the Mentor/work-based supervisor/educator, Liaison Lecturer/Learning Team Tutor and the Senior Representative from the organisation. The issue will be noted in the student’s file.
Process for Student Raising Concerns in Practice

I have a concern about the safety or wellbeing of people in my care or in the environment in which I work

If there is an immediate risk of harm, report your concerns without delay to the appropriate person or authority

If you choose to tell an academic member of staff they must inform the appropriate senior person in the organisation and the Programme Leader/Course Director without delay

Raise your concern internally with your mentor/local manager/ supervisor/ relevant senior person in the organisation

Raise your concern with the Key Liaison Lecturer/SL for Practice Education/Educator/ Practice Learning Manager

No further action required. Student debriefed

Decision is made to escalate the concern

Senior Person in health/social care organisation and Prog Leader/Course Director informed

Formal statement written by student with support of university

Review of handling of process between organisation & University and agree any actions required

Feedback to key stakeholders

Concern investigated via local procedures

Keep informed

Keep informed

16/01/2012