

## Policies and processes relating to students and practice education

### Policy

Title: **Raising Concerns Regarding Safety and Standards in Practice Service Delivery**

This policy applies to all students following a programme of study in the Faculty of Health, Social Care and Education of Kingston University and St George's University of London

#### 1. BACKGROUND

- 1.1. Within the programmes of study in the Faculty there may be 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 an organisation. There is a need, therefore, to identify a process for responding to concerns which supports students and staff to report issues of concern.
- 1.2. The University recognises that students on placement have a duty to report dangerous, abusive, discriminatory or exploitative behaviour and practice in all situations they may come across during their practice placement experience and not just in the area where they may be learning and being assessed.
- 1.3. The University also understands 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.
- 1.4. 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 on a practice placement, are addressed consistently, effectively and appropriately. In addition, this policy will support the development of health, social care and education students to fulfil their professional responsibilities as required by the Nursing and Midwifery Council, Health and Care Professions Council and the Department of Education.

#### 3. WHEN

This policy applies throughout a student's education programme when engaged in practice, but issues may be reported at any time 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, 2018a, 2015; HCPC 2016). 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. Any action should be consistent with the relevant local authority safeguarding procedures.**

#### 4. WHAT

4.1. A **concern** relates to something the student has become aware of whilst in the practice setting. An issue, wrongdoing or risk, which affects others. The DoH (20 Care and Support Statutory Guidance (Chapter 14) suggests this may include:

- Physical abuse – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- Domestic violence – including psychological, physical, sexual, financial, emotional abuse; so called ‘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, indecent exposure and 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, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive 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.
- Discriminatory abuse – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion
- Organisational 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 – 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.

4.2. **This is not the same as a complaint which relates to an issue where a student is complaining about how they have personally been treated whilst on a practice education experience and are seeking personal resolution. Please see the process for a student making a complaint about their personal experience on practice placement.**

#### 5. HOW

5.1. In the first instance, all students with concerns should try to raise them with their placement Practice Supervisor/ Practice Assessor/ work-based supervisor/ manager/educator.

5.1.1. If the student believes there is an immediate risk of harm this should be reported without delay to an appropriate person within the placement setting.

- 5.1.2. If the student believes they, a colleague or another person is putting someone at risk of harm they should report their concerns to their Practice supervisor/Practice Assessor/manager/educator or to their lecturer or tutor
- 5.1.3. The student should seek help from the Practice supervisor/Practice Assessor /manager/educator if someone indicates they are unhappy with their care or treatment
- 5.1.4. It is recognised that the student may find it difficult to report their concerns or be unsure about the process. If they require advice or support at any stage they can seek support from their Practice supervisor/Practice Assessor /manager/educator, Liaison/Link Lecturer or Tutor, the identified Independent Person or the Student Support Officer. The student may also wish to seek pastoral support from their Personal Tutor.
- 5.1.5. If the student has reported the concern within the practice placement this should also be reported to the senior academic staff member supporting practice placements.
- 5.2. Students should ensure they are maintaining confidentiality when discussing issues outside of the practice placement.
- 5.3. Where the student is an employee of the placement provider (e.g. seconded or 2<sup>nd</sup> Registration Student or Employment-Based Route (EBR) Student) and the incident occurs in the seconding organisation, the student must follow their own organisation's whistle blowing/raising concerns policy but will also be expected to inform the senior academic staff member supporting practice. The student will be supported to raise a concern as detailed above.
- 5.4. 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 or the Independent Person
- 5.5. Following discussion there are two possible outcomes:
  - 5.5.1. No further action is required and student debriefed
  - 5.5.2. Concerns are valid and decision made to take the matter further
- 5.6. If the decision is made to take the matter further the senior academic staff member supporting practice or the Independent Person informs the Course Leader/Director.
- 5.7. Following discussion, either within the placement or in the university, if the student wishes to raise their concerns formally, s/he must be provided with information about the procedure including:
  - 5.7.1. The student is advised about the possible consequences of raising a concern 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 him/herself available for this.
  - 5.7.2. The student should keep a written record of the detail of their concern and who they have raised it with, either verbally or in writing, and on what date, maintaining confidentiality.
  - 5.7.3. If the student wishes their concern to remain anonymous the limitations this puts on investigating the concern further must be discussed with the student. The professional responsibility for raising concerns and the implications for fitness to practice should also be discussed.

- 5.7.4. If appropriate the student is advised to contact her/his union representative at this stage. The student may also require counselling support.
- 5.8. The senior academic staff member supporting practice or the Independent Person should make a record of the conversation with the student and notify the relevant senior person in the organisation (which would include the Director of Nursing/Midwifery, equivalent senior person for Allied Health Professions, Social Work and Education) the Course Leader/Director and Head of Department. **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.
- 5.9. 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.
  - 5.9.1. The student will be provided with support in writing their statement by the relevant member of staff linked to the area of practice, the senior academic staff member supporting practice or the Independent Person.
- 5.10. The statement will be forwarded by the senior academic staff member supporting practice or the Independent Person to the relevant senior person in the organisation (which would include the Director of Nursing/Midwifery, equivalent senior person for Allied Health Professions, Social Work and Education) and to the Head of the relevant Department/programme.
- 5.11. The relevant senior person in practice (see 5.7) will monitor the progress of the concern.
- 5.12. 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, or Course Leader/Director, Head of Department, relevant Senior Person in Practice and the Director of Nursing/Midwifery or equivalent for Allied Health Professionals, Social Work and Education in the organisation.
  - 5.12.1. The full investigative report will be held internally. The senior person in practice will discuss with the Head of Department the appropriateness of sharing details of the full report in exceptional circumstances with stakeholders.
- 5.13. If a representative of a placement provider wishes to interview the student, permission **MUST** be sought from the Head of Department or Course Leader/Director at the University.
- 5.14. For students who are employees of a school or a health or social care organisation (e.g. seconded or 2<sup>nd</sup> Registration Student/Employment-Based Route Students):
  - 5.14.1. If the incident occurs within the student's employing organisation, the employing organisation does not need to seek permission from the University to

interview the student but should seek permission from the student's line manager in the organisation and must also inform the student's Course Leader/Director.

- 5.14.2. If the incident occurs outside the student's employing organisation (for example where the student is on placement in another organisation), the placement provider organisation needs to seek permission from the student's line manager and must inform the student's Course Leader/Director.

## 6. Out of Hours Management

**Where a student has an urgent 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 Course Leader/Director and Head of Department for the relevant pre-registration programme copied in. A response will be provided on the next working day.

## 7. OTHER RELATED DOCUMENTS

Department of Education (2015) Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges Gov.UK

Department of Education (2012) Teachers' Standards: Guidance for School Leaders, School Staff and Governing Bodies Gov.UK

Department of Health (2018) Care Act Statutory Guidance; available at:  
<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#safeguarding-1>

Francis, R (2014) Freedom to Speak Up <http://www.freedomtospeakup.org.uk/>

Health and Care Professions Council (2016) Guidance on Conduct and Ethics for Students HCPC

Health and Care Professions Council (2016) Standards of Conduct, Performance and Ethics HCPC

Health and Care Professions Council (2016) How to raise a concern, Information for members of the public HCPC

Nursing and Midwifery Council (2018a) The Code: Professional standards of practice and behaviour for nurses, midwives and nursing associates NMC: London

Nursing and Midwifery Council (2018b) Standards for student supervision and assessment, NMC: London

Nursing and Midwifery Council (2015) Raising Concerns: Guidance for nurses and midwives, NMC: London

Pan London London Approach to implementation of the SSSA (2018)

## Glossary of Terms regarding people involved

The Student:	As a developing professional the student is responsible for raising a concern where they observe or identify a situation or event, which has the potential to cause risk or harm to an individual(s) or organisation.
Practice supervisor/Practice Assessor /Work-based Supervisor/Educator:	As a registered health, social work or education professional, the Practice supervisor/Practice Assessor /work-based supervisor/educator is responsible for raising a concern where they observe or identify a situation or event, which has the potential to cause risk or harm to an individual(s) or organisation. As a registered health care/social work/education professional they are responsible for acting on a concern raised by a student which has the potential to cause risk or harm to an individual(s) or organisation. They will be expected to support a student reporting a concern to them by discussing the concern and identifying whether further action needs to be taken.
The academic staff member supporting practice.	This includes lecturers and tutors responsible for visiting placement areas and supporting practice education. As a registered health care/social work/education professional they are responsible for acting on a concern raised by a student which has the potential to cause risk or harm to an individual(s) or organisation,. They are usually the first point of contact for the student within the School or Department, when raising a concern about an issue in a practice setting. The expectation is that they will, where possible, address the concern in the practice placement with the Practice supervisor/ Practice Assessor/ educator /manager as appropriate.
The senior academic staff member supporting practice:	This includes the Department Practice Education Leads and Directors of Practice Education in each of the Schools. As registered health care/social work/education professionals they are responsible for acting on a concern brought to their attention by a student which has the potential to cause risk or harm to an individual(s) or organisation. In addition, they are responsible for following up any issues raised with the relevant senior person in the organisation and in the university.
Personal Tutor	As a registered healthcare/social work/education professional they are responsible for ensuring appropriate pastoral support is in place for the student. They are also responsible for supporting the student to raise a concern in practice if the student has not reported this elsewhere.
Course Leader/Director	As a registered healthcare/social work/education professional they are responsible for sign posting the student to appropriate support to raise a concern if this is not already in place
Relevant Senior Person in Practice	e.g. Trust Named Person, Head of Department, senior manager, education lead in organisation, Supervisor of Midwives.

Independent Person	Each School should identify a person(s) who is independent of the student's practice assessment (normally the School's Director of Practice Education) who can advise and support the student through the process of raising a concern and monitor that their assessment is not negatively affected by the process.
Student Support Officer	They are responsible for supporting the student to raise a concern in practice if the student has not reported this elsewhere. They will provide information about the process to peer supporters to enable them to encourage students to report concerns if this comes to their attention.