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Speaking up within Practice Environments Procedure

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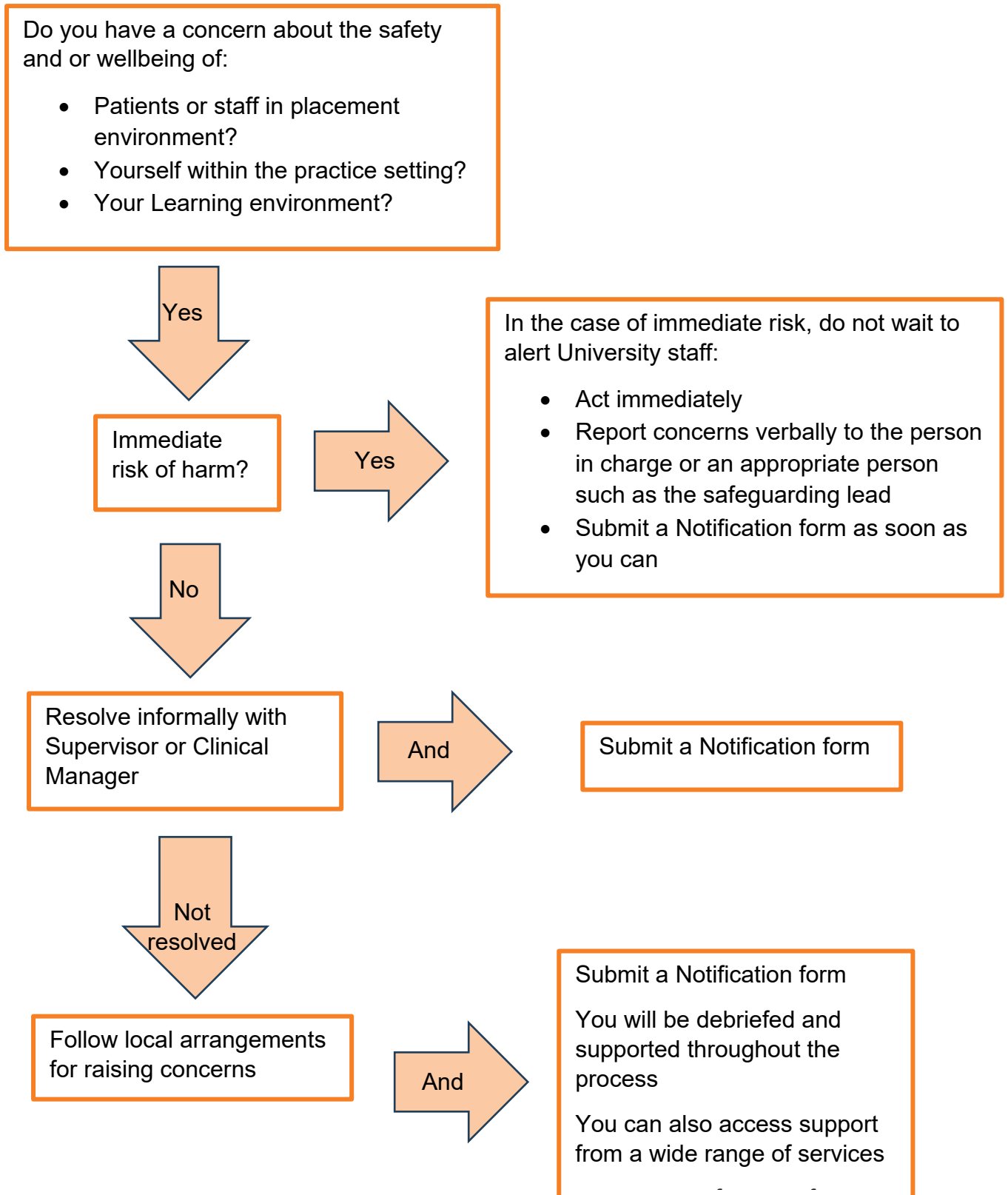
1. Introduction

- 1.1. This procedure is written for students to help and support them with the process for raising a matter of concern. In all investigations there will be a clear and transparent process in place from initial concern to resolution. It has been written to reflect “Raising and acting on concerns about patients’ safety” (GMC 2012), Freedom to Speak Up policy for the NHS (2022) and NHSE guidance on escalating quality concerns (2023)¹
- 1.2. Although this procedure has been written directly for students, there will be occasions when it is necessary for the placement provider to share concerns regarding practice with Kent and Medway Medical School (KMMS). Whilst it is important that issues raised are resolved ‘at source’ wherever possible, there will be learning to be shared across organisations. Likewise, if concerns are likely to, or have affected the clinical learning environment, then the placement provider must inform KMMS as soon as practicably possible. There is a [direct link on the website](#) for this purpose.
- 1.3. If a member of public needs to raise a matter of concern to KMMS, they should also use the website link.
- 1.4. Should there be concerns about a student related to knowledge and skills, professional behaviours, or health fitness these should be addressed through the [Low-Level Concerns, Fitness to Study, and Fitness to Practise Policy and Procedures](#).
- 1.5. Please note that University of Kent (Kent) /Canterbury Christ Church University (CCCU) Guidance to Students on Whistleblowing² is a policy that refers to malpractice within the universities and not to ‘whistleblowing’ or speaking up as the phrase is commonly understood within health and social care placements.

¹ <https://www.gmc-uk.org/professional-standards/professional-standards-for-doctors/raising-and-acting-on-concerns>
<https://www.hee.nhs.uk/sites/default/files/Education%20Quality%20Escalating%20Quality%20Concerns.pdf>

² <https://www.canterbury.ac.uk/asset-library/policy-zone/Whistleblowing-Student-Guidance.pdf>

2. Flow Chart for Speaking up within Practice Environments



3. Aim for informal resolution –

- 3.1. It can sometimes be hard to know whether you should speak up but please try to explore this as your first option in your practice placement. As a student, you should initially raise your concerns with your supervisor or the clinical manager of the practice learning environment. Your supervisor or clinical manager will advise on local placement area policy for raising concerns.
- 3.2. You may be required to put your concerns into writing, and you are encouraged to seek support from KMMS before writing any type of statement or report. Remember to:
- Be factual – give an accurate report of the issue and give the date and time that it occurred.
 - Stay neutral – you are likely to be upset about the issue, so it is important to clearly state the concerns that you have and what impact or possible impact there is to the safety of you, your patients or colleagues
 - Keep a record – include key details of what happened, who was involved, when and where it happened.
 - Seek support – it takes courage to speak up and you may be upset at having to do so. You may wish to seek support from your Personal Academic Tutor (PAT)/Clinical Academic Tutor (CAT), other KMMS support services as outlined on the portal, or you can access external support.³
- 3.3. **You should submit a Notification form via the KMMS website even if your concern has been resolved informally.**
- 3.4. **If you feel unable to raise your concern or feel that your concern has not been acted upon then seek support from KMMS to complete a Notification form via the website. This should be completed as soon as possible after the event. Remember to continue to use the support services available.**

4. What happens next/further investigation

³ <https://www.kent.ac.uk/student-support/contact-us>
<https://nationalguardian.org.uk/speaking-up/find-my-fts-guardian/>
<https://speakup.direct/contact-us/>

4.1. When you speak up then you should expect:

- To be thanked for doing so
- To feel that you are being treated fairly
- To feel that you are being listened to and your concerns are being taken seriously
- KMMS will send your Notification Form to relevant parties for investigation and for a response to be given
- You will be kept informed of how long the investigation is expected to take and should there be any delays to this process.

5. Outcome of investigation

5.1. Wherever possible, the full investigation report will be shared with you in a manner which meets the expectations of all parties involved. Where recommendations are identified, KMMS will work with the organisation to make the necessary changes and keep you informed of this.

5.2. KMMS encourage you to maintain links with your support system during this time and for as long as they are of benefit to you.

5.3. If you feel that you have not been listened to or that the matter has not been resolved, you can speak to:

- The Freedom to Speak Up Guardian within the organisation where your placement is
- The Guardian Service
- Speakup Direct
- NHS England (NHSE)⁴
- Relevant professional body for matters around conduct of a member of staff
- Care Quality Commission (CQC) for quality and safety concerns about the services it regulates

6. External reporting and reviewing the process

6.1. Annual reporting and review of handling of process between organisation & university and agreement of actions required via Operation Quality Contract Review Meetings (OCQRM).

6.2. Termly monitoring of all concerns raised through KMMS Placement Committee.

⁴ <https://www.hee.nhs.uk/sites/default/files/documents/Raising%20concerns%20contacts.pdf>

- 6.3. Sharing with NHSE and Professional Statutory and Regulatory Bodies as appropriate.