

TRUST-WIDE POLICY DOCUMENT

Freedom To Speak Up Policy Including whistleblowing

Policy Number:	HR06
Scope of this Document:	Board of Directors and all staff
Approving Committee:	Board of Directors
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Lead Author(s):	Freedom To Speak Up Guardian

TRUST-WIDE NON-CLINICAL POLICY DOCUMENT

2017 – Version 5

Quality, recovery and
wellbeing at the heart
of everything we do

TRUST-WIDE NON-CLINICAL

FREEDOM TO SPEAK UP POLICY

Further information about this document:

Document name	Freedom To Speak Up including whistle blowing
Document summary	This policy states the Trust's commitment to openness, which includes encouraging our staff to raise their concerns with what they see happening at work
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To be read in conjunction with	Standards of Business Conduct (F04) Disciplinary Policy (HR01) Corporate Grievance procedure (HR2) Corporate Policy for the Reporting, Management and Review of Adverse Incidents. (SA03) Policy for the management of Complaints/Concerns. (SA06) Safeguarding and Protection Of Children. (SD13) Safeguarding Adults (SD17) Standards documents from Professional Regulatory Bodies
This document can be made available in a range of alternative formats including various languages, large print and braille etc	
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Version Control:

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3	Amended in line with January 2015's Trust Board (Item E4)	January 2015
4	Amended in line with March 2015's Trust Board	January 2017

SUPPORTING STATEMENTS

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

SAFEGUARDING IS EVERYBODY'S BUSINESS

All Mersey Care NHS Foundation Trust employees have a statutory duty to safeguard and promote the welfare of children and vulnerable adults, including:

- being alert to the possibility of child/vulnerable adult abuse and neglect through their observation of abuse, or by professional judgement made as a result of information gathered about the child/vulnerable 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/vulnerable 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 vulnerable adult (if appropriate to your role);
- ensuring contemporaneous records are kept at all times and record keeping is in strict adherence to Mersey Care NHS Foundation Trust policy and procedures and professional guidelines. Roles, responsibilities and accountabilities, will differ depending on the post you hold within the organisation;
- ensuring that all staff and their managers discuss and record any safeguarding issues that arise at each supervision session

EQUALITY AND HUMAN RIGHTS

Mersey Care NHS Foundation Trust recognises that some sections of society experience prejudice and discrimination. The Equality Act 2010 specifically recognises the *protected characteristics* of age, disability, gender, race, religion or belief, sexual orientation and transgender. The Equality Act also requires regard to socio-economic factors including pregnancy /maternity and marriage/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.

Mersey 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.

Mersey 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**

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1. PURPOSE AND RATIONALE – WHY WE WOULD WANT YOU TO SPEAK UP?

- 1.1 Speaking up about any concern you have at work is really important. In fact, it's vital because it will help us to keep improving our services for all patients and the working environment for our staff.
- 1.2 You may feel worried about raising a concern and we understand this. But please do not let this put you off. In accordance with our professional and NHS obligations, including our duty of candour to patients, our senior leaders and entire board are committed to an open and honest culture. We will look into what you say and you will always have access to the support you need.
- 1.3 This policy is aimed to promote and facilitate raising concerns but, in doing so, addresses the protection that the Trust and the law provides to those that do so.

2. OUTCOME FOCUSED AIMS AND OBJECTIVES

- 2.1 This policy is a standard integrated policy and was one of a number of recommendations of the review by Sir Robert Francis into whistle blowing in the NHS, aimed at improving the experience of Speaking Up in the NHS. Similar policies are adopted throughout the NHS as a minimum standard to help to normalise the raising of concerns for the benefit of all patients

3. SCOPE

- 3.1 This policy takes account the provisions of the Public Interest Disclosure Act 1998 (which is part of the Employment Rights Act 1996), which provides legal protection for employees (which is defined widely) who raise an issue or make what is known as a 'protected disclosure' which, in the reasonable belief of the member of staff, refers to one or more of the following:
 - i. that a criminal offence has been committed, is being committed or is likely to be committed;
 - ii. that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he / she is subject;
 - iii. that a miscarriage of justice has occurred, is occurring or is likely to occur;
 - iv. that the health and safety of an individual has, may have been or is likely to be endangered; and / or
 - v. that the environment has been, is being or is likely to be damaged.
 - vi. deliberate concealing of information about any of the above.
- 3.2 A whistleblower is an employee who raises a concern relating to any of the above. If you reasonably believe that any of the above have happened, are happening or are likely to affecting any of our activities you should raise it, even if you think others may have done so already. This policy sets out how may raise concerns at section 7, but the protection for whistleblowers applies however protected disclosures are raised.
- 3.3 Remember that if you are a healthcare professional you also have professional duties to report concerns. If in doubt, please raise it and provide as much information as you can.

4. FINANCIAL AND CONDUCT OF BUSINESS CONCERNS

- 4.1 As a member of staff you may become aware of a concern about the business or financial conduct of another member of staff or someone who has access to the business matters of the Trust. In such a case you should raise it.

- 4.2 In cases which may involve improper use of Trust resources, managers who receive such concerns should inform the Executive Director of Finance of this also to ensure that necessary processes are followed.
- 4.3 As an alternative you can telephone the Anti Fraud Specialist who will deal with your issue in a confidential way, providing support and guidance to you. Contact details can be found in Appendix B.

5. CLARIFICATION OF APPROACH

- 5.1 Those who raise concerns are protected from detriment by the legislation and this policy; you will not be at risk of losing your job or suffering any form of reprisal as a result and anyone responsible for such a detriment will be subject to disciplinary action (and if a professional referral to their regulator).
- 5.2 Provided you are acting honestly, it does not matter if you are mistaken or if there is an innocent or alternative explanation for your concerns.
- 5.3 Remember that 'Freedom to Speak Up' is just one of many ways in which you can raise concerns

6. DUTIES

All Staff

Who can raise concerns?

- 6.1 Anyone working in the NHS, including those working for an independent organisation providing NHS services can raise concerns. This includes agency workers, temporary workers, students, volunteers and governors.
- 6.2 Who should I raise my concern with?
In many circumstances the easiest way to get your concern resolved will be to raise it formally or informally with your line manager (or lead clinician or tutor). But where you do not think it is appropriate to do this, you can use any of the options set out below.
- 6.3 If raising it with your line manager (or lead clinician or tutor) does not resolve matters, or you do not feel able to raise it with them, you can contact the Trust Freedom to Speak Up Guardian (FTSU) – this is an important role identified in the Freedom to Speak Up review to act as an independent and impartial source of advice to staff at any stage of raising a concern, with access to anyone in the organisation, including the chief executive, or if necessary, outside the organisation.
- 6.4 When you speak up you can expect a speedy reply and support from the Freedom to Speak Up Guardian throughout the process.
- 6.5 Freedom to Speak Up Guardian (FTSU)
 - (a) The FTSU will be the main point of contact for staff who would like to raise a concern about their or another's negative experiences of care or working for the Trust if not addressed through your manager. The post-holder will:
 - i. try and work with the person raising the concern and their managers to attain local resolution .

- ii. monitor the outcome of the process to ensure that no negative effects are experienced by the staff member raising the concern.
- iii. forward the concern for formal investigation if the issues cannot be locally resolved or the complainant does not want to adopt a discursive process.
- iv. visit wards and teams formally and informally to discuss any concerns they may have and to gain an understanding of the general experiences of staff on those departments.
- v. share generic issues and concerns with managers of the service so that they are aware of pressures within service and can instigate remedial action.
- vi. work closely with staff side representatives to gain direction to her work and enable them to focus on areas of need.
- vii. feedback findings bi-annually to the trust board via a report outlining issues raised, causes and actions taken.
- viii. raise high risk concerns immediately with clinical managers or other appropriate senior/executive managers to ensure safety is maintained at all times.
- ix. work with concerns that are given anonymously.
- x. support staff who raise concerns by 'walking along' the side them and advocating for them during any investigation process.
- xi. ensure that the role and outcomes of the work of the FTSU is known by the majority of staff by publication of newsletters, including information in Chief Executive bulletins and attending staff meetings.

6.6 See Appendix A for further staff involved in the Freedom to Speak Up process and Appendix B for contact details.

7. PROCESS – HOW TO FEEL SAFE TO RAISE A CONCERN

- 7.1 Raise with your line manager where possible and seek their help to resolve the issue. If this does not meet your needs or you do not feel it is appropriate to link with your managers then the FTSU is the key person for you to share your issues with. This can be done by-;
- a) You can raise a concern through the Freedom To Speak Up Guardian email account
 - b) The Freedom to Speak up Guardian mobile phone number
 - c) *Tell Joe* who will pass it on to the FTSU Guardian
 - d) A letter to FTSU Guardian anonymous if needed
 - e) Submit an incident form
 - f) Your Trade Union
 - g) Anti Fraud or corruption team
 - h) Via the Lead Executive and Non-Executive , see diagram below.
- 7.2 If local resolution cannot be achieved the next stage can be to undertake a fact finding investigation, the FTSU will liaise with the Director of Patient Safety who will organise this process. You will be informed of who is handling the matter, how you can contact him/her and whether your further assistance is needed. The Director of Patient Safety will write to you summarising your concern and setting out the how we propose to handle it. The FTSU will remain involved and support you through this process.

7.2 The investigating officer will take statements from all people involved, including you, as well as any witnesses. Documentary and other evidence may also be gathered. Where applicable, a referral may be made to the Anti Fraud Specialist or other appropriate body. It must also be noted that if the concern raised becomes the subject of a police or other agency investigation, the Trust investigation may be temporarily halted.



7.3 A report of the investigating officer’s findings will be produced. If this shows that your concern was well founded then appropriate action will be taken. This might involve changes to procedures, management systems or disciplinary action against a member of staff. You will receive a response at the conclusion of the investigation, giving you as much feedback as we can. We will not however be able to tell you the precise action we take if disciplinary action is involved, as that may breach confidentiality.

7.4 We aim to provide you with a final written response within a reasonable time period from when the concern was raised. As a general guide any investigation to hearing should be no longer than two months. This may be relatively longer if there is a safeguarding or police investigation or if the circumstances are complicated. However, we will keep you informed of progress in writing. It must be noted that we may not be able to tell you the precise action that is taken where this may infringe a duty of confidence owed by us to someone else or may interfere with any legal action we wish to take.

7.5 In circumstances where an allegation is unfounded the subject and informant of the allegation will be notified in writing.

8. PRINCIPLES OF APPROACH

8.1 We are committed to the principles of the Freedom to Speak Up review and its vision for raising concerns, and we will respond in line with them (see Appendix C).

8.2 We are committed to listening to our staff, learning lessons and improving patient care. On receipt the concern will be recorded and you will receive an acknowledgement within two working days. The central record will record the date; the concern was received, whether you have requested confidentiality, a summary of the concerns and dates when we have given you updates or feedback.

8.3 If there is some hesitation about speaking up about a concern then you must put the interests of the patients first and act to protect them, overriding personal and professional loyalties when necessary. This can be done either anonymously or in confidence. By maintaining anonymity, there is no guarantee that your identity will not be deduced by those implicated and / or by colleagues. By providing your name the trust will be in a better position to support you. (See Appendix F for further details on anonymous reporting)

8.4 **The Trust will always do its very best to manage your anonymity if this is what you wish.**

8.5 The law provides legal protection for employees who are whistleblowers.

- 8.6 Where possible this will always be resolved a local level. But there will be occasions when this may need to be addressed formally.
- 8.7 Whilst we would like to assure you that we want you to raise concerns internally and that we will deal with it properly, please know that you can also contact regulatory bodies, such as the Health and Safety Executive or the Audit Commission. Where you believe the local response has been inadequate, you can also raise your concerns with a body such as the Care Quality Commission, the newly established Whistleblowing Line for the NHS, National Freedom to Speak Up Guardian or your Trade Union may be able to advise you which route is appropriate in your circumstances. Contact details for many of these organisations can be found in Appendix D.
- 8.8 The aim of this policy is to provide an internal mechanism for reporting concerns, investigating and addressing them. In most cases you should not find it necessary to alert anyone externally.
- 8.9 See flow chart for Freedom to Speak Up (Appendix E).
- 8.10 The FTSU Guardian will keep in touch, supporting you through this process and monitoring the impact speaking up has on the Whistleblower. **A member of staff should not be negatively affected by speaking up about a concern they have.**

9. TRAINING AND SUPPORT

- 9.1 Details on the local support available to you can be found Trust's website.
- 9.2 However, you can also contact the Whistleblowing Helpline for the NHS and social care, your professional body or trade union representative.

10. MONITORING

- 10.1 The board will be given high level information about all concerns raised by our staff through this policy and what we are doing to address any problems. We will include similar high level information in our annual report. The board supports staff raising concerns and wants you to feel free to speak up.
- 10.2 We will review the effectiveness of this policy and local process at least annually with the outcome published and changes made as appropriate
- 10.3 Below is a list of other national and local procedures which direct how people can and should speak up about their concerns; -
- a. Whistleblowing Helpline for the NHS and Social Care, which provides advice and support for both employers and employees;
 - b. Public Interest Disclosure Act 1998 – information on the Act is available at the Whistleblowing Helpline website;
 - c. NHS Constitution for England – available on the NHS Choices website by clicking here;
 - d. Speak out Safely;
 - e. NHS Employers;

The following Trust policies (available on the Trust's website):

- f. Standards of Business Conduct (F04)
- g. Disciplinary Policy (HR01)
- h. Corporate Grievance Procedure (HR02)
- i. Corporate Policy for the Reporting, Management and Review of Adverse Incidents (SA03)
- j. Policy for the Management of Complaints / Concerns (SA06)
- k. Safeguarding and protection of children (SD13)
- l. Safeguarding Vulnerable Adults from Abuse (SD17)

Further Staff involved

1. The Chief Executive

The Chief Executive has delegated responsibility for ensuring compliance with this policy to the Executive Director of Nursing.

2. The Executive Director of Nursing

The Executive Director of Nursing has a responsibility to ensure that there are adequate systems in place to ensure that concerns at work or matters of business probity and / or conduct are adequately and timeously resolved and will report to Trust Board as and when the Policy is evoked.

3. The Executive Director of Finance

In line with the Trust's governance arrangements, the Executive Director of Finance will take the lead for those concerns raised in respect of financial probity.

4. Local divisional and team Managers

Managers have a responsibility to ensure that staff are made aware of this policy should they wish to raise a concern at work. They also have a responsibility to listen to their staff and try to sort out any problems that you have as they occur.

Human Resources Business Partners, Managers and Advisors

Human Resources Business Partners, Managers and Advisors have a responsibility to ensure that the advice given to staff regarding this policy is accurate and in line with the content and spirit of the policy.

5. Members of Staff, Contractors, Students and Volunteers

Your responsibility - the *NHS Constitution* emphasises that staff have a responsibility to raise concerns, which has been reinforced by the development of a statutory *duty of candor*

6. Non Executive Director

The lead Non Executive Director is a further point of contact for staff to raise concerns with and he can try and resolve locally with locally senior managers or move forward for a formal investigation.

The Non Executive will also brief the board on any issues of concerns on an on-going basis and formally via the sharing of the bi annual report written by the FTSU and Director of Patient Safety.

The Non Executive Director will meet with the FTSU on a formal basis to receive information about their role and issues that are being raised staff and informally when required to support and guide the FTSU.

7. Director of Patient Safety

This role will provide direct line management support on a day to day to the FTSU to ensure that any concerns they have about their working experiences are dealt with quickly and efficiently.

They will coordinate the completion of any formal investigations commissioned into a concern raised by staff and ensure the response is fed back to staff and the actions emanating from the report are implemented by the service.

They will work with the FTSU to complete the bi annual Trust Board Report in to the issues of concern raised by staff. They will oversee the completion of the staff concerns data base to ensure that all actions taken and issues raised are documented and can be used to triangulate issues raised in relation areas of practice or individuals.

8. Patient Safety Administrator

The Patient Safety Administrator has a responsibility to ensure that the Raising Concerns database contains up to date information on a daily basis and monitor the progress of investigations. If required, the Patient Safety Administrator liaises with appointed investigators to ensure that investigation reports are completed within the timescales.

Contact Details for Key Staff involved

There is an alternative route for raising concerns which can be used if

- (a) you feel unable to talk to your immediate manager or the next level manager; or
 - i. you wish to raise the concern outside the usual management structure in your department. In such cases you can contact:
 - ii. Pat Prescott – Freedom to Speak Up Guardian email pat.prescott@merseycare.nhs.uk or telephone 07867 341 050
 - iii. Ray Walker – Executive Director of Nursing and Lead Director for *Raising Concerns at Work* (telephone 0151 473 2965 or email ray.walker@merseycare.nhs.uk), or
 - iv. Gerry O’Keeffe - Non-Executive Director Lead for *Raising Concerns at Work* (email raisingconcerns@merseycare.nhs.uk),
 - v. your Human Resources Advisor, Manager or Business Partner for your area (for details please go the Workforce Portal on the Trust’s intranet site by [clicking here](#)), or
 - vi. your Trade Union representative for advice;
- (b) you may also raise a matter directly with the Chief Executive Joe Rafferty through the ‘Tell Joe’ by emailing telljoe@merseycare.nhs.uk.



Where an issue relates to potential fraud and/or corruption you may wish to raise your concerns with:

- a) Darrell Davies, Anti Fraud Specialist (telephone 0151 285 4520, or 0151 285 4500 and ask for the Local Counter Fraud Team); or
- b) Neil Smith, Executive Director of Finance (telephone 0151 471 2205 or email neil.smith@merseycare.nhs.uk); or
- c) if you feel that this avenue is not appropriate, you can call the NHS National Fraud and Corruption Reporting Line on 0800 028 4060 (Monday to Friday, 08.00 hrs to 18.00 hrs).

Should you wish to avail yourself of Mersey Care’s Staff Support Service, they are available at 0151 330 8103.

Principles of Approach



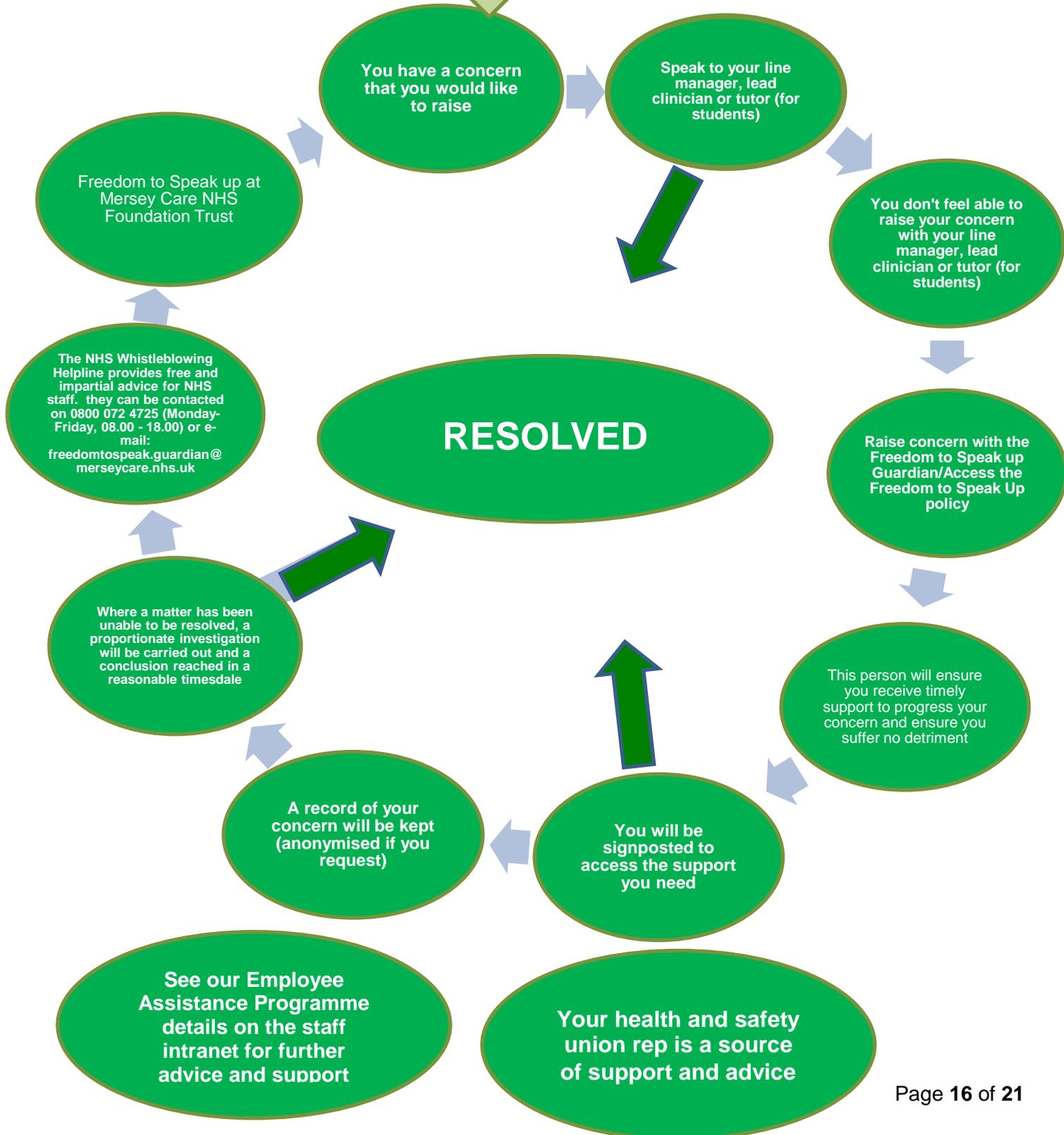
External Contact Details

1. Whistleblowing Helpline for the NHS and Social Care for independent and confidential advice call Tel 08000 724 725
2. Public Concern at Work Tel: 020 7404 6609
3. Care Quality Commission (CQC) Finsbury Tower, 103-105 Bunhill Row, London, EC1Y 8TG. Tel 03000 616161
4. General Medical Council Regents Place, 350 Euston Road, London, NW1 3JN, Tel 0161 923 6602
5. General Chiropractic Council, 44 Wicklock Street, London, WC1 9HL, www.gcc-uk.org, Tel 02077135844
6. General Dental Council, 37 Wimpole Street, London W1G 8DQ, www.gdc-uk.org, Tel 0845 222 4141
7. General Optical Council 41, Harley Street, London, W1G 8DJ www.optical.org, Tel 020 7580 3898
8. General Osteopathic Council 176 Tower Bridge Road, London, SE1 3LU, www.osteopathy.org.uk, Tel 020 7357 6655
9. Health Professionals Council Park House, 184 Kennington Park Road, London SE11 4BU, www.hpc-uk.org, Tel 0845 300 4472 or 020 7840 9802 or 0845 300 6184
10. Nursing & Midwifery Council 23 Portland Place, London, W1B 1PZ www.nmc-uk.org, Tel 0207 637 7181
11. Royal Pharmaceutical Society of Great Britain 1 Lambeth High Street, London, SE1 7JN, www.rpsgb.org.uk, Tel 0207 572 2737 or 0845 257 2570
12. NHS Fraud, Bribery and Corruption. Reporting suspicions of NHS fraud, bribery and corruption are as follows: Anti Fraud Specialist (LCFS) Tel: 0151 285 4500 & NHS Fraud and Corruption Reporting Line Tel: 0800 028 40 60 Council 41, Harley Street, London, W1G 8DJ www.optical.org, Tel 020 7580 3898 & NHS online reporting form: www.reportnhsfraud.nhs.uk & NHS Protect, Weston House, 246 High Holborn, London, WC1V 7EX. Tel: 020 7895 4500
13. General Osteopathic Council 176 Tower Bridge Road, London, SE1 3LU, www.osteopathy.org.uk, Tel 020 7357 6655
14. Health Professionals Council Park House, 184 Kennington Park Road, London SE11 4BU, www.hpc-uk.org, Tel 0845 300 4472 or 020 7840 9802 or 0845 300 6184
15. Nursing & Midwifery Council 23 Portland Place, London, W1B 1PZ www.nmc-uk.org, Tel 0207 637 7181
16. Royal Pharmaceutical Society of Great Britain 1 Lambeth High Street, London, SE1 7JN, www.rpsgb.org.uk, Tel 0207 572 2737 or 0845 257 2570

Freedom to Speak Up Flowchart for raising concerns

Freedom to Speak Up Flowchart for raising concerns

Mersey Care **NHS**
NHS Foundation Trust



Raising Concerns Anonymously

Please remember that if you choose to raise a concern anonymously the trust will be unable to provide personal assurance, protection or feedback to an anonymous source.

The trust would rather you provided your name so that the trust can:

- respond directly to you in respect of the concerns you have raised;
- ensure that it has taken your concerns seriously and ask for further information (if necessary).
- if you are hesitating about reporting a concern and are considering doing so anonymously, you need to aware of the following:
- (you must put the interests of patients first and act to protect them, overriding personal and professional loyalties when necessary;)
- the law provides legal protection against victimisation and / or dismissal for members of staff who disclose information in the public interest;
- you do not need to wait for absolute proof in order to raise a concern – you are able to justify raising a concern if you do so in the public interest and through the appropriate channels, even if you are mistaken;
- by maintaining anonymity, there is no guarantee that your identity will not be deduced by those implicated and / or by colleagues. By providing your name the trust will be in a better position to support you.

15 Equality and Human Rights Analysis

Title: Freedom to Speak up including Whistleblowing Policy
Area covered: Trust Wide

What are the intended outcomes of this work? <i>Include outline of objectives and function aims</i> All trust employees will be aware of the new freedom to speak up policy and processes
Who will be affected? <i>e.g. staff, patients, service users etc</i> Service Users/Carers/Staff/Volunteers/representatives of agencies undertaking work on behalf or within buildings of Mersey Care NHS Trust.

Evidence
What evidence have you considered? The previous policy
Disability (including learning disability) This policy applies to all staff regardless of disability
Sex Promotes and supports equality in relation to sex
Race The NHS Race Equality Standard requirements are identified in relation to the workforce
Age Promotes and supports equality in relation to age
Gender reassignment (including transgender)
Sexual orientation Promotes and supports equality in relation to Sexual Orientation (Also within Marriage and Civil Partnership)
Religion or belief Promotes and supports equality in relation to religion and belief
Pregnancy and maternity Promotes and supports equality in relation to pregnancy and maternity rights for parents
Carers Promotes and supports equality in relation to carers, taking into consideration flexible working patterns
Other identified groups

Asylum seekers, traveller families
Cross Cutting This policy applies to all

Human Rights	Is there an impact? How this right could be protected?
Right to life (Article 2)	<i>Not engaged</i>
Right of freedom from inhuman and degrading treatment (Article 3)	The policy seeks to ensure that people are treated with respect and dignity.
Right to liberty (Article 5)	Human Rights based approach supported
Right to a fair trial (Article 6)	Human Rights based approach supported
Right to private and family life (Article 8)	Human Rights based approach supported
Right of freedom of religion or belief (Article 9)	Human Rights based approach supported
Right to freedom of expression Note: this does not include insulting language such as racism (Article 10)	Human Rights based approach supported
Right freedom from discrimination (Article 14)	Human Rights based approach supported

Engagement and Involvement <i>detail any engagement and involvement that was completed inputting this together.</i>
Safeguarding Team
Patient Safety Team
Staff Side

Summary of Analysis <i>This highlights specific areas which indicate whether the whole of the document supports the trust to meet general duties of the Equality Act 2010</i>
Eliminate discrimination, harassment and victimisation The policy sets out clear requirements in relation to HR practice. Links into other HR policies.

Advance equality of opportunity

Promote good relations between groups

Reduce 'Just Culture' within the workforce

What is the overall impact?

A positive and open working environment free from blame

Addressing the impact on equalities

Action planning for improvement

Detail in the action plan below the challenges and opportunities you have identified.

NONE

For the record

Name of persons who carried out this assessment:

Pat Prescott
Lindsay Devine
Jayne Johnson

Date assessment completed:

6th January 2017

Name of responsible Director:

Steve Morgan

Date assessment was signed:

January 2017

Action plan template

This part of the template is to help you develop your action plan. You might want to change the categories in the first column to reflect the actions needed for your policy.

Category	Actions	Target date	Person responsible and their area of responsibility
Monitoring			
Engagement			
Increasing accessibility			