



Raising Concerns Procedure

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1. Introduction

- 1.1 The purpose of this procedure is to ensure any concerns expressed by the student whilst in a practice learning environment (ie whilst on a practice placement) are addressed consistently, effectively and appropriately. In addition, this procedure will support the development of students to fulfil their statutory and professional responsibilities as required by the relevant Professional Statutory and Regulatory Bodies (PSRBs).
- 1.2 Within the programmes of study set out in Section 2, there may be situations within practice learning environments where a student observes or identifies a situation or event that has the potential to cause risk or harm to an individual, individuals or an organisation. This document sets out a procedure for responding to such concerns.
- 1.3 Students have a duty to report dangerous, abusive, discriminatory or exploitative behaviour and practice in all situations they may come across during practice and not just in an area where they may be learning or are being assessed.
- 1.4 The University understands the relative lack of power and vulnerability of students who may be undergoing a process of assessment by work-based staff in a practice learning environment. 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.
- 1.5 The University will endeavour to ensure that no student is disadvantaged as a result of raising a concern under this procedure, provided that it is done without malice and in good faith. A malicious or vexatious complaint, however, could result in disciplinary action against the student under the Student Disciplinary Regulations or fitness to practise action against the student under the Fitness to Practise Policy and Procedure.

- 1.6 Any action taken under this procedure should be consistent with the relevant practice learning provider or local authority policies and procedures including those relating to safeguarding.
- 1.7 Appendix A contains a flow chart explaining how the procedure set out in Section 7 operates in practice.

2. Scope of procedure: practice learning environments

- 2.1 The procedure applies at all times and in a range of practice learning environments, including placement, on-site practical or simulated learning, work experience and in University-run professional services such as the Crest Clinic or the counselling service.
- 2.2 This procedure applies to programmes within the Schools of Psychology and Life and Health Sciences that lead to an award that is accredited by a professional, statutory or regulatory body, including but not limited to the Health and Care Professions Council (HCPC), the Nursing and Midwifery Council (NMC), the British Psychological Society (BPS), the British Association of Play Therapists (BAPT), the Association for Dance Movement Psychotherapy UK (ADMP UK) and the British Association of Counselling and Psychotherapy (BACP). The procedure also applies to programmes in the School of Education that lead to Qualified Teacher Status (QTS).
- 2.3 The procedure may apply to other programmes where students are learning in regulated practice learning environments. In such cases, the Academic Department will draw the student's attention to this procedure before the student enters the practice learning environment.

3. Responsibilities

- 3.1 Most PSRBs place an onus on registrants to report concerns about the safety or wellbeing of others, including for example the NMC, the HCPC, the BPS, the TRA and the ADMP. Students at the University who are studying on a programme which could lead to registration with a PSRB are expected by the University to adhere to any guidance, codes of conduct, conditions or registration or other documents that apply to full registrants of these PSRBs.
- 3.2 Some PSRBs, such as the NMC and the TRA, have their own raising concerns policies or procedures, and students and staff are expected to familiarise themselves with and apply these as appropriate in practice learning environments. Students may also have a statutory requirement to raise concerns, such as under s.20 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014. Examples of concerns which would require a report to be made under this procedure are set out in Section 4.
- 3.3 Specific members of staff have particular roles as set out throughout this procedure. More broadly, all members of staff engaged in the delivery of any of the programmes defined in Section 2 above have a responsibility to read, understand and implement this procedure where necessary. Failure to do so may lead to disciplinary action against the member of staff under the University's staff disciplinary procedures.
- 3.4 All students studying on one of the programmes defined in Section 2 above have a responsibility to read, understand and implement this procedure where necessary. Failure to report a concern under this procedure where required may call into question a student's fitness to practise and may result in a student being subject to an investigation under the Student Disciplinary Regulations or the Fitness to Practise Policy and Procedure.
- 3.5 Any concerns raised under this procedure may require the University to make a report to a third party, including the police, social services, the NHS or other professional, statutory or regulatory bodies. This may include reporting the conduct of students, University staff or placement staff.

4. Types of concerns covered by this procedure

- 4.1 Concerns which would require a report to be made under this procedure include, but are not limited to, the following examples:¹
 - Where a criminal offence is suspected to have occurred.
 - Physical abuse – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
 - Domestic violence – including psychological, physical, sexual, financial, emotional

¹ Adapted from Chapter 14 of the [Care Act 2014 Care and Support Statutory Guidance](#).

abuse, 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, cyberbullying, 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. Victims of modern slavery may be patients, clients, service users, members of staff, members of the public or other students.
- 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 ongoing 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 Raising a concern under this procedure is different from a student making a complaint about their own experience in a practice learning environment. Students can raise a concern about their own experience using this procedure, but there will be limits to the extent to which it can be taken forward if they wish to remain anonymous. Students who would like to make a complaint about their experience in a practice learning environment should consult the complaints procedure set out in the relevant programme or practice-learning environment handbook. Formal complaints should be made to the University Secretary under the Student Complaints Procedure.

5. Reporting

- 5.1 If the student has witnessed or suspects that there is an immediate risk of harm to another individual in a practice learning environment, or if further harm will be caused by not making an urgent report, including where there is an immediate safeguarding risk, they should normally report their concerns to the appropriate person or authority within the practice learning provider immediately, following the practice learning provider's emergency procedures (see Section 6 of this procedure). Where a student witnesses or otherwise receives information regarding a safeguarding concern, they should report these concerns to the Designated Safeguarding Lead at the practice learning provider using the appropriate processes relevant to their professional practice setting in the first instance. In all cases, the student should also notify the senior academic staff member at the University who is supporting the practice setting. If the student reports an immediate safeguarding concern to a member of University staff, the University staff member must inform the relevant senior person in the practice learning provider immediately.
- 5.2 In other circumstances where there is not an immediate risk of harm to another person (see Section 6 of this procedure), students should normally raise a concern with the placement or practice mentor/work-based supervisor/assessor/manager/educator. Any concerns should also be reported to the senior academic staff member supporting the setting. Examples include:
- If someone indicates they are unhappy with their care or treatment.
 - If there is a danger or risk to health and safety, such as where health and safety rules or guidelines have been broken, but this danger or risk is not imminent or immediate.
 - Issues to do with staff conduct, such as unprofessional attitudes or behaviour, including concerns related to equality and diversity.
 - Issues to do with delivering care involving nurses, midwives, nursing associates or other staff members.
 - Issues to do with care in general, such as concerns over resources, products, people, staffing or the organisation as a whole.
 - Issues to do with the health of a colleague, which may affect their ability to practise safely, but where such issues are not imminent or immediate.
 - Misuse or unavailability of clinical equipment, including a lack of adequate training.
 - Financial malpractice, including criminal acts and fraud.
- 5.3 It is recognised that students may be unsure as to whether a report is required, or otherwise find it difficult to report their concerns or are unsure about the procedure. If they require advice or support at any stage, they can seek support from an academic guidance tutor, clinical supervisor, reflective practice tutor, a member of the programme team, the Programme Leader, Research Programme Leader, a Wellbeing Officer, Roehampton Students' Union or other.
- 5.4 Students should not discuss the details of any concerns with other students, friends,

family or individuals outside of the University or the practice learning provider except where permission has been given to do so by the University or the practice learning provider.

6. Emergency reporting and reports made outside of working hours

- 6.1 Urgent reports, including those made outside of normal working hours, should be made in line with the organisation's emergency procedures. An example of where such a report may be required is where a student believes that a person is at risk of harm if such a report is not made immediately, or where any harm already caused or experienced may be increased if there is a delay in reporting. This will include immediate safeguarding concerns as defined in the University or practice learning provider's safeguarding policies and procedures.
- 6.2 Where the student needs to make an urgent report to the University outside of University opening hours, or the practice learning provider requires urgent advice or information from the University, the student should contact the University's Security Team at 020 8392 3333 and send an email to the senior academic staff member supporting the practice setting, whose details will be provided to the student at the beginning of each academic year. A response will be provided at the earliest opportunity.

7. Procedure

- 7.1 Where the student is also an employee of the placement organisation or practice setting provider and a concern arises within the scope of that student's employment, the student must follow their employer's whistleblowing or raising concerns procedure and should also inform the senior academic staff member supporting the practice setting.
- 7.2 If the student feels unable to raise the matter with the practice learning provider for any reason, their concern should be raised with the senior academic staff member supporting the practice setting.
- 7.3 The senior academic staff member supporting the practice setting should arrange for a conversation between the Programme Leader, the student and themselves. Following this discussion, there are three possible outcomes:
 - The concern does not fall within the scope of this procedure. No further action is required, and the student should be debriefed by their academic guidance tutor.
 - The concern falls within the scope of this procedure but there is no obligation for the student to make a formal report. This may be, for example, where the concern is limited to the personal experience of the student and there is no risk of harm to other individuals. The student should be advised that if there is no obligation to report but they nonetheless wish to make an anonymous report, there may be limitations on the extent to which it can be investigated.
 - The concern falls within the scope of this procedure and the student is under an

obligation to make a formal report. Where appropriate, the practice learning provider or other parties should be informed.

- 7.4 The student should be advised as to whether there is an obligation to report in the specific circumstances and with respect to the relevant statutory, regulatory or professional body requirements (see Sections 5 and 6 of this procedure). The student should also be advised of the following:
- That the University acknowledges the student's concern and will provide appropriate support throughout the process.
 - That the practice learning provider may need to interview the student as part of their own investigation process and that the student should make themselves available for this.
 - That the student should keep a written record of the details of their concern and who they have raised it with, whether verbally or in writing, and on what date, maintaining confidentiality.
 - That the student may contact Roehampton Students' Union for independent advice. Where a student is also a member of staff at the placement organisation, they should also be advised that they can contact their trade union representative. The student should also be referred to the University Wellbeing Team for support.
 - That failure to engage with an investigation where required may lead to a student's fitness to practise being called into a question, which may lead to an investigation under the University's Student Disciplinary Regulations or Fitness to Practise Policy and Procedure.
- 7.5 Where a concern is formally reported, the Programme Leader should inform the Head of Department and the University Secretary, who will arrange for a central record of formal concerns raised to be kept by the University.
- 7.6 The senior academic staff member supporting the practice setting should make a record of the conversation with the student and the Programme Leader, and notify the relevant senior person in the placement organisation. A decision should also be made by the Programme Leader whether to withdraw the student/all students from the placement area concerned.
- 7.7 The student should write a formal statement of the observed events within 2 working days of the placement organisation being informed. The statement should provide a record of the observed conduct and include essential information such as dates, times and locations of any events, including who was involved, the conduct observed and whether there were any witnesses to the incident. The statement should be signed by the student and any other parties who are prepared to put their names to it. If the student wishes to remain anonymous the University will not disclose their identity without their consent unless required to do so by law.
- 7.8 The student will be provided with support in writing their statement by the senior academic staff member supporting the practice setting. The student must not write a statement without support from the University, even if they are asked to do so by the practice learning provider.

- 7.9 The statement will be forwarded by the senior academic staff member supporting the practice setting to the relevant senior person in the placement organisation, the Programme Leader and the Head of Department.
- 7.10 The relevant senior person in the practice learning provider will monitor the progress of the investigation.
- 7.11 If the practice learning provider wishes to interview the student, permission should be sought from the Programme Leader or Head of Department at the University. If the student is also an employee of the placement organisation, the placement organisation does not need the University's permission to conduct an interview with the student but should notify the Programme Leader or Head of Department that the interview will be taking place. The placement organisation should allow the student to bring a supporter or students' union representative to the interview.

- 7.12 Following completion of the investigation by the practice learning provider, all relevant stakeholders will normally be provided with a summary of key concerns and outcomes and any learning points for the practice learning provider or the University. The stakeholders will include the student, the practice learning provider staff, the senior academic staff member supporting the practice setting, the Programme Leader, the University Secretary and the Head of Department. The relevant stakeholders may not receive a copy of the full investigative report, and any disclosure to stakeholders will be made with due consideration to confidentiality and data protection.
- 7.13 A student may be required to provide further statements or attend hearings in respect of staff disciplinary process, police, PSRB or other relevant organisation investigations/ hearings. In such situations the student will be supported by an appropriate member of University staff.

8. Additional Resources

The following additional resources are available to assist those who are using this procedure:

Department of Education (2019) 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 (2014) Care and Support Statutory Guidance; issued under the Care Act 2014 Gov.UK

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

Health and Care Professions Council (2010) 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 (2012) How to raise a concern, Information for members of the public HCPC

Nursing and Midwifery Council (2015) The Code: Professional standards of practice and behaviour for nurses and midwives, NMC: London

Nursing and Midwifery Council (2008) Standards to support learning and assessment in practice. NMC standards for mentors, practice teachers and teachers, NMC: London

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

Appendix 1 - Raising Concerns Procedure Flowchart

