BrisDoc`s Freedom to Speak Up (Whistleblowing)

BrisDoc Freedom to Speak Up Guardians

Kelvin Blake (Non-Executive Director)

Margaret Hickman (Non-Executive Director)

freedomtospeakup@brisdoc.org

Version:	Owner:	Created:
1.4	Helen Harvey-Wilson (Senior Peoples team Co-Ordinator.)	22nd March 2023
Published:	**Approving Director:**	**Next Review**
15/10/2026	Mike Duncan (Director of People)	15/10/2029

Contents

Introduction 4

Principles 4

Scope 4

Definitions 4

Support Available 5

Line Managers 5

Freedom to Speak Up Guardians 5

People Team 5

Governance Team 5

Employee Assistance Programme (EAP) 5

NHS England Speak Up Support Scheme 5

Routes for Speaking Up 5

Internal Routes 6

External Routes 6

Ways to Raise a Concern 6

Roles and Responsibilities 6

Co-Owners 6

Line Managers 7

Freedom to Speak Up Guardians 7

Executive Lead for Freedom to Speak Up 7

Non-Executive Directors 7

Senior Leaders 7

What Happens When You Speak Up 7

Overview of the Process 7

Key Principles 8

Timescales 8

Escalation 8

Detailed Procedures 8

Raising a Concern 8

Resolution and Investigation 9

Confidentiality and Protection 9
Learning and Improvement 9
Governance and Oversight 9
Version Control **10**
Appendix 1: EQIA **11**
Purpose 11
Key Considerations 11
Intersectionality 11
Monitoring and Review 11

Introduction

At BrisDoc, we are committed to creating a culture where all co-owners feel safe, supported, and confident to speak up. Speaking up plays a vital role in ensuring patient safety, maintaining high-quality care, and fostering a positive working environment.

We recognise that co-owners are often best placed to identify when something does not feel right. Whether this relates to patient care, safety, behaviour, or ways of working, we want concerns to be raised early and addressed appropriately.

Speaking up is a core component of being a well-led organisation. It forms part of our overall governance and assurance framework and supports continuous learning and improvement across BrisDoc.

BrisDoc is an independent provider delivering NHS-commissioned services. We adopt NHS policy principles but tailor practice to our governance arrangements. This policy is informed by national Freedom to Speak Up (FTSU) guidance and applied in a way that is proportionate to our size and organisational structure.

Speaking up is distinct from other processes such as grievances, complaints, or incident reporting. Where appropriate, concerns may be redirected to the most suitable process, with support provided to the individual.

Where issues relate solely to an individual's employment, behaviour, or a specific incident, these should normally be raised through the appropriate People Team or incident reporting processes. Speaking Up remains available where staff feel unable to use those routes or believe the concern has wider impact.

Principles

BrisDoc's approach to Freedom to Speak Up is underpinned by the following principles:

- Everyone has a voice that counts
- It is safe to speak up, and you will be supported
- Concerns will be taken seriously and responded to
- Speaking up will lead to learning and improvement
- Co-owners who speak up will not be treated unfairly

Scope

This policy applies to all BrisDoc employees and workers, irrespective of role, contract type, or length of service. This includes employees, bank workers, locums, contractors, volunteers, and former employees or workers.

Definitions

Concern

Any issue, risk, or wrongdoing relating to patient safety, quality of care, behaviour, or working practices that a co-owner believes should be raised.

Freedom to Speak Up (FTSU)

Raising concerns about patient safety, quality of care, behaviour, or working practices.

Freedom to Speak Up Guardian

An individual who provides independent and confidential support to co-owners to help them raise concerns and ensure those concerns are addressed appropriately.

Speaking Up

The act of raising a concern where something does not feel right.

Protected Disclosure

A disclosure made in the public interest under the Public Interest Disclosure Act 1998.

Whistleblowing

A type of speaking up where a concern meets the definition of a protected disclosure under the Public Interest Disclosure Act 1998.

Support Available

This section outlines the key support available to co-owners who wish to speak up.

Line Managers

Often the first and simplest route for raising concerns. Managers are expected to listen, respond, and take appropriate action.

Freedom to Speak Up Guardians

Freedom to Speak Up Guardians provide independent and confidential support to co-owners who feel unable to raise concerns through other routes. Concerns can be raised through freedomtospeakup@brisdoc.org which is accessible to the Guardians and the Directors responsible for People and Governance, who help ensure concerns are promptly picked up and directed to the Guardians.

People Team

Provides advice on concerns relating to behaviour, culture, or working environment.

Governance Team

Supports concerns relating to patient safety, quality, or clinical matters.

Employee Assistance Programme (EAP)

Confidential support available 24/7.

NHS England Speak Up Support Scheme

Provides independent, confidential support for individuals who have raised concerns.

Routes for Speaking Up

Most concerns can be raised informally through line managers and resolved quickly. Where this is not appropriate, alternative routes are available.

The following routes are available depending on the nature of the concern:

Internal Routes

Route	When to Use
Line Manager	First point of contact for most concerns
Senior Manager / Director	Where concern involves line management or requires escalation
Governance Team	Patient safety, quality, or clinical concerns
People Team	Behaviour, culture, or employment-related concerns
FTSU Guardian	Where independent support is needed or other routes feel difficult. Contact through freedomtospeakup@brisdoc.org
Executive Lead (FTSU)	Escalation where concern is serious or unresolved

External Routes

Organisation	When to Use
Care Quality Commission (CQC)	Concerns about quality and safety of care
NHS England	Concerns about NHS-commissioned services
NHS Counter Fraud Authority	Fraud or corruption concerns
Professional Regulators	Concerns about professional conduct

Ways to Raise a Concern

Concerns can be raised in different ways depending on what feels most appropriate:

- Openly – you are happy for your identity to be known
- Confidentially – your identity is known but not shared without your consent
- Anonymously – your identity is not shared

Co-owners are encouraged to raise concerns in the way that feels most comfortable. Anonymous concerns will still be considered, although it may be more difficult to investigate or provide feedback, particularly where further information or clarification is required.

Roles and Responsibilities

Co-Owners

- Speak up about concerns that affect patient care, safety, or working environment
- Provide information to support understanding of the concern
- Engage constructively in any follow-up process

Line Managers

- Create an environment where speaking up is normal and encouraged
- Listen to concerns and respond appropriately
- Take timely action or escalate where required

Freedom to Speak Up Guardians

The current Freedom to Speak Up Guardians are named on the policy cover page and BrisDoc intranet. Concerns can be raised directly with a Guardian or through the dedicated Freedom to Speak Up email address. freedomtospeakup@brisdoc.org

Freedom to Speak Up Guardians:

- Provide independent support to co-owners
- Help individuals raise concerns where they feel unable to do so
- Ensure concerns are responded to and feedback is provided
- Identify themes and support organisational learning
- Escalate concerns where appropriate

Freedom to Speak Up Guardians operate independently of line management in relation to concerns raised, have direct access to senior leadership and the Board, and any conflicts of interest will be managed appropriately.

Executive Lead for Freedom to Speak Up

- Ensures effective arrangements are in place
- Oversees how concerns are managed and responded to
- Ensures themes and learning are reported through governance structures

Non-Executive Directors

- Provide independent oversight and constructive challenge
- Review themes, culture, and organisational response to speaking up

Senior Leaders

- Promote a culture of openness and psychological safety
- Ensure learning from speaking up is acted upon

What Happens When You Speak Up

Overview of the Process

Concern Raised

A co-owner raises a concern through one of the available routes (manager, Guardian, People Team, Governance Team, or externally).

Initial Review

The concern is reviewed to determine:

- the nature of the issue
- the most appropriate route for handling it
- whether immediate action is required

Acknowledgement and Discussion

The individual who raised the concern will:

- be thanked for speaking up
- have an opportunity to explain their concern
- be informed of next steps and likely timescales

Resolution or Investigation

- Where possible, concerns are resolved quickly and informally.
- Where required, a formal investigation is undertaken.

Outcome and Feedback

Where possible, feedback will be provided on:

- actions taken
- outcomes reached

(Some details may be limited due to confidentiality.)

Learning and Action

The organisation will:

- identify themes
- take action to address issues

Key Principles

- Your concern will be taken seriously
- You will be listened to
- You will not be disadvantaged for speaking up
- Your confidentiality will be respected where requested
- Anonymous concerns will still be considered

Timescales

Timescales will vary depending on the nature and complexity of the concern. As a guide:

- Acknowledgement: within 2–5 working days
- Initial review: within 10 working days
- Investigation (if required): proportionate to complexity

Escalation

If you feel your concern has not been addressed appropriately, you can:

- raise it with a Freedom to Speak Up Guardian
- escalate to a senior leader
- use an external route (e.g. CQC, NHS England)

Detailed Procedures

Raising a Concern

Concerns can be raised verbally or in writing. The most important aspect is the information provided, not the format.

Co-owners should provide as much detail as possible to support understanding and appropriate response.

Resolution and Investigation

Where concerns can be resolved informally, this will be the preferred approach.

Where an investigation is required:

- It will be fair, timely, and objective
- It will be carried out by individuals with appropriate skills and experience
- It will be proportionate and consistent
- A compassionate approach will be taken

Appropriate oversight will be in place to ensure quality and consistency. Outcomes will be used to inform learning and improvement.

Confidentiality and Protection

BrisDoc will not tolerate any form of detriment or disadvantage as a result of speaking up.

Concerns raised in good faith will be treated seriously and individuals will be supported throughout the process.

Learning and Improvement

We use speaking up, alongside learning from other sources, to inform improvements to the services we provide and the environment in which co-owners work.

We will:

- identify themes and trends from concerns raised through speaking up
- consider what action, if any, is appropriate in response
- share learning where appropriate
- use insights to inform organisational development and decision-making

We will also review the impact of actions taken where this is proportionate and appropriate.

Themes and learning will be reported through existing governance structures to support oversight and organisational improvement.

Governance and Oversight

Freedom to Speak Up forms part of BrisDoc's governance and assurance framework. Responsibility for Freedom to Speak Up is shared across Governance and People functions, reflecting its role in both organisational assurance and culture where co-owners feel safe to speak up.

Concerns raised will be recorded in a consistent and proportionate way, handled confidentially, and used to support organisational learning and improvement.

Information relating to speaking up concerns is recorded and handled in line with BrisDoc's existing data protection and confidentiality policies. Only those with a legitimate role will have access to relevant details, and information is shared on a strictly need-to-know basis.

Senior Leadership Team and Board receive regular updates on:

- themes and trends
- actions taken
- learning and improvement

This ensures appropriate oversight of culture, safety, and quality.

The Chair will be informed of disclosures where appropriate, including those relating to fraud or serious concerns.

Version Control

Date	Reviewed by	Revision details	Version
5.4.2017	CL Nicholls	Removal of previous change register. Inclusion of Freedom to Speak Up guidance and the work of Sir Robert Francis. Inclusion of BrisDoc's Freedom to Speak Up Guardian. Updated values slide.	5
16.3.2018	CL Nicholls	Change of the Freedom to Speak Up Guardian (at their request) to BrisDoc on Executive Directors.	6
6.3.2020	CL Nicholls	Map to new template, change references. and contacts with Public Concern at Work to Protect, inclusion of links to the National Guardian's Office website, removal of AGPT and NFP, inclusion of CKMP, change commissioner to BNSSG CCG.	7
22.03.23	M. Duncan	Alignment and integration of Whistle Blowing Policy into Freedom to Speak Up policy	1
27/02/24	M Duncan	Owner changes	1.1
09/04/2025	J Brady	No changes, MD advised to re-issue with 2-year review.	1.2
09/04/2026	M Duncan	Full policy restructure to align with BrisDoc policy format. Strengthened governance and oversight, clarified roles (Executive Lead, NEDs, Guardians), enhanced investigation standards, embedded learning and improvement approach, and improved clarity of routes and processes for speaking up.	1.3
15/10/2026	M Duncan	FTSU contact email updated	1.4

BrisDoc Patient care by people who care

NHS

Appendix 1: EQIA

Purpose

This Equality Impact Assessment ensures that the Freedom to Speak Up Policy supports an inclusive culture and does not disadvantage any group of co-owners.

Key Considerations

Protected Characteristic	Potential Impact	Actions / Mitigation
Disability	May affect confidence to speak up	Multiple routes available, including confidential and independent options
Race / Ethnicity	Potential barriers to voice	Policy emphasises inclusive culture and equal access
Sex / Gender	Potential differences in experience of speaking up	Clear protection from detriment and fair treatment
Sexual Orientation	Risk of under-reporting concerns	Emphasis on psychological safety and inclusion
Religion or Belief	Cultural considerations in raising concerns	Flexible and confidential routes available
Age	Confidence and experience may vary	Support through managers and Guardians
Pregnancy / Maternity	Concerns about impact on role	Protection from detriment and supportive handling
Gender Reassignment	Sensitivity and confidentiality required	Confidential routes and respectful handling
Marriage / Civil Partnership	No differential impact identified	Policy applies equally

Intersectionality

BrisDoc recognises that individuals may experience overlapping barriers. The policy supports flexible, person-centred approaches to ensure all co-owners feel able to speak up.

Monitoring and Review

- Feedback from co-owners will inform ongoing improvements
- Themes from speaking up will be reviewed for equality impacts
- The policy will be reviewed regularly to ensure continued fairness