# Raising Concerns and Whistleblowing Policy

## Policy Statement

*[insert practice name]* is committed to ensuring public safety and encouraging all staff to raise any concerns about risks of harm or wrongdoing. This may include patient safety, malpractice or regulatory breaches they think may endanger the public.

This policy and related procedures are based on the Independent National Whistleblowing Officer (INWO), [whistleblowing principles](https://inwo.spso.org.uk/whistleblowing-principles) and [National Whistleblowing Standards (2020)](https://inwo.spso.org.uk/national-whistleblowing-standards) for NHS Scotland.

## Responsibilities

Every staff member has a [professional responsibility](https://standards.gdc-uk.org/pages/principle8/principle8.aspx#:~:text=8.1.,professional%20performance%20of%20a%20colleague%3B&text=someone%20asking%20you%20to%20do,and%20act%20to%20protect%20them.) to protect all patients.

Any concern should be raised at the earliest opportunity, ideally within 6 months of the concern being identified.

The practice will ensure staff members have access to the details of the confidential contacts within the NHS board (see below for INWO and NHS Boards contacts)

## Procedure

A concern is anything that has happened, is happening or may happen that affects the public, staff or NHS provider.

Staff members should not feel uncomfortable about raising concerns. All concerns will be given due attention, managed in a considerate way and treated in confidence. Staff members that raise concerns will be supported during and after the procedure e.g. can be accompanied at meetings, signposted to external resources and legal protections.

Many concerns that may meet the whistleblowing definition can be raised and addressed within the dental practice. INWO refers to this as “business as usual”. If this is not possible or at the request of the person raising the concern, the two-stage procedure must be followed.

**Raising a concern**

The process of raising a concern is not part of the formal whistleblowing procedure.

Actions for the staff member raising the concern

* Keep a note of the key details, such as people involved, dates and what happened.
* First raise the concern with *[e.g. the Practice Manager/Principal Dentist]*.
  + The name of the person raising the concern and the details of the concern will usually remain in confidence. If this is not possible the staff member will be advised who will be informed.
* If it is not possible to raise concern within the practice, contact the health board confidential contact and/or whistleblowing champion, or the Independent National Whistleblowing Officer for advice (details below).

**Managing a concern**

The INWO provides a [flow chart](https://inwo.spso.org.uk/sites/inwo/files/Standards/NationalWhistleblowingStandards_OverviewFlowchart.pdf) that gives an overview of the process of raising a concern and the initial stages in managing that concern.

* Consider whether the concern raised constitutes whistleblowing, i.e. meets the [definitions of whistleblower and whistleblowing concern.](https://inwo.spso.org.uk/definitions-what-whistleblowing)
  + Other concerns (e.g. grievances) will be managed via other applicable practice policies *e.g. HR policies*
* If the whistleblowing definitions are met, in discussion with the person who raised the concern, agree whether the concern can be addressed informally (as “business as usual”) or should be managed using the two-stage procedure, as described below.
* Provide the person who raised the concern with the INWO flow chart.

**National Whistleblowing Standards two-stage procedure**

Once it has been confirmed that the concern meets the whistleblowing definitions and with the agreement of the staff member, then it will be managed under the two-stage procedure.

Whistleblowing concerns can be managed at stage 1 or stage 2. Stage 2 concerns are more complex and may need a detailed investigation before the practice can respond. Concerns may also progress from stage 1 to stage 2, for example, if the concern will not be responded to within 5 days, or the staff member is not satisfied with the outcome at stage 1.

**Stage 1 – Early resolution of raised concern**

* The concern raised will be managed by the *e.g. Practice Manager/Principal Dentist* or referred to an appropriate person.
* The process will follow a systematic approach to resolution, for example, the [Raising Concerns Reporting Form (including INWO Whistleblowing Stage 1 and Stage 2).](https://www.psm.sdcep.org.uk/wp-content/uploads/2021/06/Raising-Concerns-Reporting-Form-June-2021.docx)
* The outcome and any actions taken will be reported to the staff member who raised the concern.

**Stage 2 – Investigation**

* The concern will be acknowledged by the *e.g. Practice Manager/Principal Dentist* within 3 days of receipt. The acknowledgment should include available support for the staff member and predicted timescales.
* The concern may be managed *e.g. Practice Manger/Principal Dentist* or another appropriate person.
* The process will follow a systematic approach to resolution, *e.g. as detailed in the reporting form*.
* The staff member will be provided with a response within 20 days of raising the concern, including what was or has still to be investigated, how the investigation was/will be carried out and what the staff member role will/may be.
* If requested, the staff member can be informed of the ongoing developments and actions.
* The outcome and any actions taken will be reported to the staff member.

**Independent external review, (Independent National Whistleblowing Officer)**

At completion of the two-stage process, the staff member may contact the INWO for an independent external review on the way the concern was handled, the outcome, or how they were treated during the process. The INWO cannot normally review concerns where the concern has not been through the two-stage whistleblowing procedure, or it has been more than 12 months after the staff member became aware of the concern.

**Recording the raised concern**

All raised concerns will be recorded on a standard [raising concerns reporting form](https://www.psm.sdcep.org.uk/wp-content/uploads/2021/06/Raising-Concerns-Reporting-Form-June-2021.docx).

* Ensure that access to the reporting form will be limited to *Practice Manager/Principal Dentist.*
* The staff member’s details, the raised concern, notes of the investigation and reporting forms will be stored securely as required by the Data Protection Act (2018)

**Reporting**

Reporting data will be requested by the Health Board at regular intervals.

* Send quarterly to the local NHS board when concerns have been raised.
* Send annual reports to the local NHS Board, even when no concerns have been raised during the year.
* Include details of the [10 Key Performance Indicators](https://inwo.spso.org.uk/governance-recording-learning-lessons) set out in the Standards in both quarterly and annual reports.

**Quality Improvement**

The practice is committed to improve through learning. The *Practice Manager/Principal Dentist* will review the concerns that have been raised, process, outcome and actions to identify if they could be a learning opportunity.

* Any outcomes resulting from investigations of concerns may be shared with the practice team to encourage good practice.

If any staff member has any queries about this policy, please contact *[e.g. the Practice Manager/Principal Dentist]*.

**Detail of NHS confidential contact and whistleblowing champion**

*[Details of NHS Health Board whistleblowing contacts]*

**Detail of Independent National Whistleblowing Officer**

Bridgeside House  
99 McDonald Road  
Edinburgh  
EH7 4NS

INWO@spso.gov.scot

INWO Advice Line for Scotland: 0800 008 6112

e-mail INWO@spso.gov.scot

Policy last updated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date of next review: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

The following staff have read and understood this policy *[include all team members]*.

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| **Dental Team Member** | **Position** | **Signature** | **Date** |
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