



## Raising concerns about poor practice: Guidance for staff and students in the School of Healthcare

### Purpose of this document

- 1.1 The purpose of this document is to ensure that any incidents that cause concern and are witnessed by staff or students of the School of Healthcare whilst on practice placements on university business are reported appropriately.

### Introduction

- 2.1 The staff and students of the School of Healthcare have a professional and moral obligation to ensure the best possible care for service users. Most of the care provided by health and social care professionals and organisations is of a good or excellent standard enabling service users to reach their full potential in a way that provides them with dignity and respect and protects the right to privacy and confidentiality. When care does not meet this expectation staff and students have a duty to report what they have seen so it can be investigated. It may be that these incidents have the potential to cause harm to service users through lack of competence of employees, professional or otherwise, or they may constitute actual abuse of service users.
- 2.2 Although not an exhaustive list, according to Nursing and Midwifery Council (2016, p2) abuse can include:
- Physical, psychological, or sexual abuse
  - Domestic violence
  - Financial or material abuse
  - Modern slavery
  - Discriminatory abuse
  - Organisational abuse
  - Neglect and acts of omission.
  - Self-neglect
- 2.3 It is far better that all health and social care staff raise concerns about an incident which later turns out to have a satisfactory explanation than to not raise concerns when, in retrospect, this should have happened.
- 2.4 It is sometimes difficult to raise concerns because:
- You may feel disloyal.
  - You are worried about assessment outcomes.
  - You may wonder if you are right in your interpretation as other staff do not seem concerned.
  - You are scared and feel vulnerable
  - You are worried about how you will be treated if you have to work in that area after your concerns are made public.

2.5 The School of Healthcare is committed to ensuring that staff or students who raise concerns about poor standards of care are supported.

### 3 What should I do if I have concerns about practice?

3.1 The most important action you must take if you see something in practice that concerns you is to talk to somebody who can investigate it.

**Appendix A** (for nursing and midwifery students and Independent and Supplementary Prescribing Trainees who are nurses or midwives) and **Appendix B** (for all other students/trainees) are flowcharts showing who concerns may be raised with. Please note that organisations do prefer concerns to be raised with them as soon as possible. We would particularly encourage students to raise concerns with the practitioner who supervises them at the earliest opportunity. You can raise your concerns with somebody in the School of Healthcare, but this is likely to cause some delay in starting any investigation at the local level and could be of further detriment to service users. If you feel that your complaint is not being dealt with, however, then we would encourage you to raise the issue within the School.

3.2 In addition to raising your concerns with another person we would advise that you do the following:

- Make a note of the incident in your own words identifying, where possible, dates, times, names of those involved and the details of everything that occurred as soon as possible after the event. These details will be needed if a statement is requested at a later date.
- If asked for a statement, ensure that it is objective giving the details of what happened and not adding opinion. You are encouraged to share a draft with a member of School staff as a check to make sure that the language you have used is appropriate and that the sense of what happened is clear.
- Be prepared to give evidence to a senior manager or an investigation panel to tell them what occurred. If that is necessary, you can take somebody with you and a member of staff from the School of Healthcare would be prepared to accompany you. Alternatively, if you belong to a trade union, you may wish to take a union representative with you.
- Reflect on what has happened and consider whether anybody involved could have behaved differently to ensure a better outcome for service users.
- Evaluate your placement in the normal way ensuring that you give a reflection of your whole placement and not let the incident you witnessed colour the whole of your evaluation.

3.3 Please note, do not discuss the details of the incident with others who are not involved in any way. When an incident is being investigated, the investigation needs to be based on the statements of witnesses and not on what others have heard. Those involved in the incident also have a right to confidentiality.

3.4 If you raise a concern with the School, we will always investigate it with the placement provider. If we determine there is any risk to service users or student education, we will complete an exceptional report to the NMC or other professional body as appropriate, so that they can consider whether further action should be taken. Appendix C provides a template for use with social care, counselling, psychotherapy, and pharmacy placement concerns to fulfil professional statutory and

regulatory body (PSRB) reporting requirements. Appendix D sets out the NMC requirements for nursing and midwifery programmes and Appendix E provides an example of NMC Exceptional Reporting Template. We will also ensure that other universities whose students share the placement are aware of any concerns about the placement's suitability.

- 3.5 NMC Exceptional reports that are submitted to the NMC are shared initially with the relevant placement providers so that they can confer and provide any additional supporting details and action plans. HEIs who share the same placement circuit are also informed of the planned exceptional report and provided with a copy when this has been submitted to the NMC, as well as of any proposed actions to address concerns, and we inform them of current and future allocations of students to the area. University of Leeds PPU allocates students from Leeds Trinity, Leeds Beckett and Open University, and from the Foundation Degree Nurse Associate programmes at Leeds Beckett and the University of Leeds Lifelong Learning Centre. In addition to this both Nurse Associate Programmes may have apprentices on these programmes who have substantive employment contracts in these placement areas and therefore when an exceptional report is submitted, these HEI partners are all informed. In addition to this, exceptional reports are logged and discussed at quarterly Practice Placement Quality Group meetings that are chaired by the University of Leeds School of Healthcare to ensure that actions are followed up on and that all relevant parties are kept informed and up to date.

#### **4 Ongoing placements for students**

- 4.1 Students may be concerned that they will have to return to their placement after they have raised concerns about practice. Wherever possible we would encourage this and would expect that students will be treated fairly and be included as part of the team. However, should there be any signs of negative behaviour towards students we will remove them from the practice area and provide the student with an alternative placement. We will also raise our concerns with the placement's organisation that this has occurred.
- 4.2 If the concern raised affects the quality of your and other students' education, we follow the School's guidelines (Appendix F) and withdraw you from that placement and find an appropriate alternative. We will notify the other universities who have students on that placement.

#### **5 The raising of concerns about practice within written work**

- 5.1 Raising concerns about poor standards of practice is not appropriate within a written assignment. By the time this information is read by someone who can act upon it the incident will be quite old and far more difficult to investigate it. The concern should have been raised immediately and the fact that it has not suggests unprofessional practice (of course, where a student has raised concerns in the appropriate way but also written about it within the usual boundaries of confidentiality and noted that those concerns were raised at the time, this is perfectly acceptable).
- 5.2 If it becomes clear that there were concerns that should have been raised the module leader for the module in which the assignment was submitted will speak to the student about the incident. If appropriate, the actions in Appendix A (for nursing and midwifery students) or Appendix B (for all other students) will be followed. The grade for the piece of work will be reduced in the same way any other unprofessional practice would be penalised.

## Further Reading:

General Pharmaceutical Council (2019) Raising Concerns Guidance Available online at:  
<https://www.pharmacyregulation.org/raising-concerns>

Health and Care Professions Council (2019) *How to Raise a Concern*. London: HCPC. Available online: <https://www.hcpc-uk.org/globalassets/resources/guidance/how-to-raise-a-concern.pdf>

Health and Care Professions Council (2016) *Standards of performance, Conduct and Ethics*. London: HCPC. Available online: <https://www.hcpc-uk.org/globalassets/resources/standards/standards-of-conduct-performance-andethics.pdf>

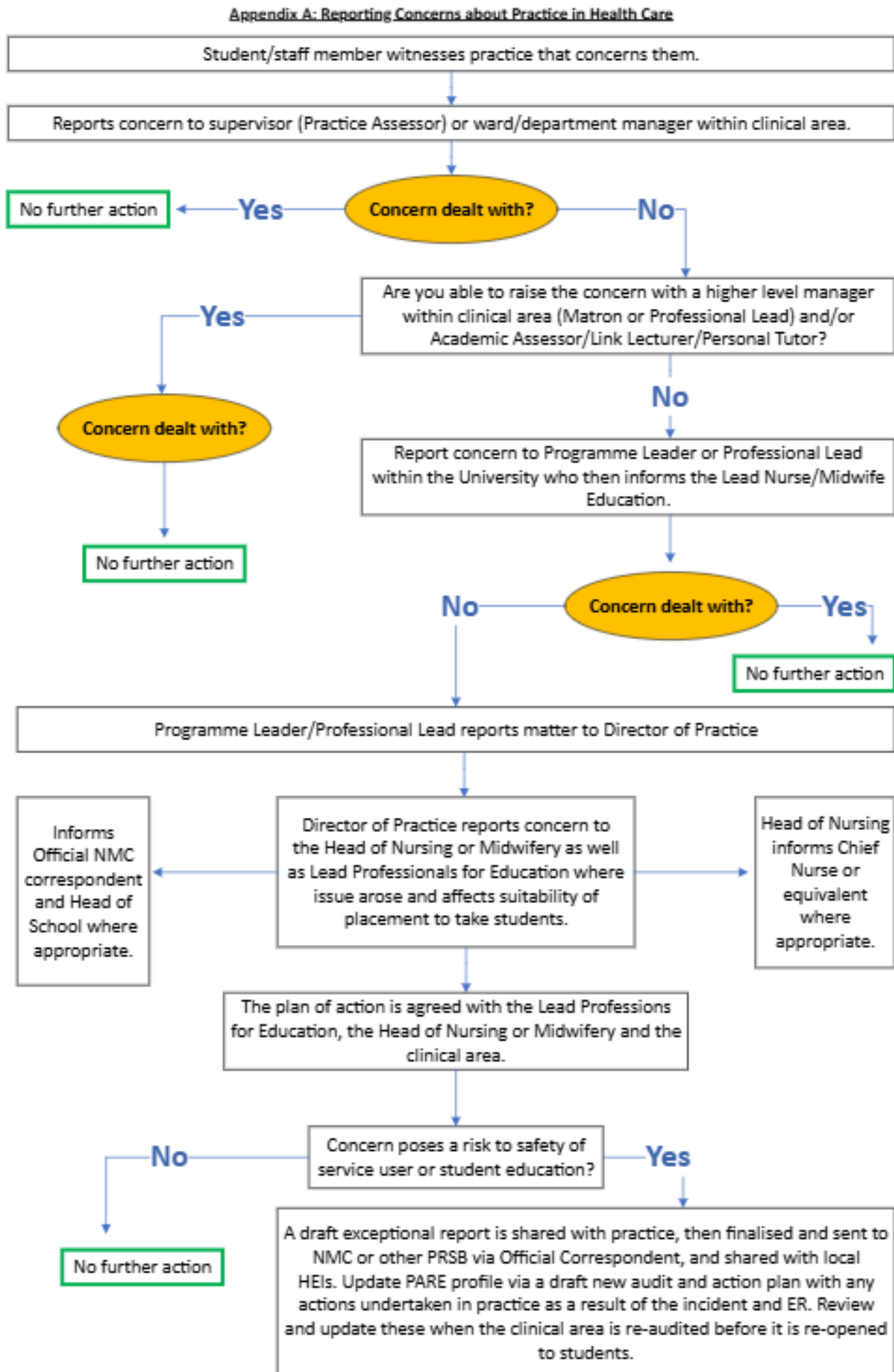
Nursing and Midwifery Council. 2019. *Exceptionally report a risk*. [Online]. [Accessed 1<sup>st</sup> April 2019]. Available from: <https://www.nmc.org.uk/education/quality-assurance-of-education/how-we-monitor-education-institutions/exceptionally-report-a-risk/education/how-we-monitor-education-institutions/exceptionally-report-a-risk/>

Nursing and Midwifery Council .2018. *Raising concerns: Guidance for nurses, midwives and nursing associates*. London: Nursing and Midwifery Council.

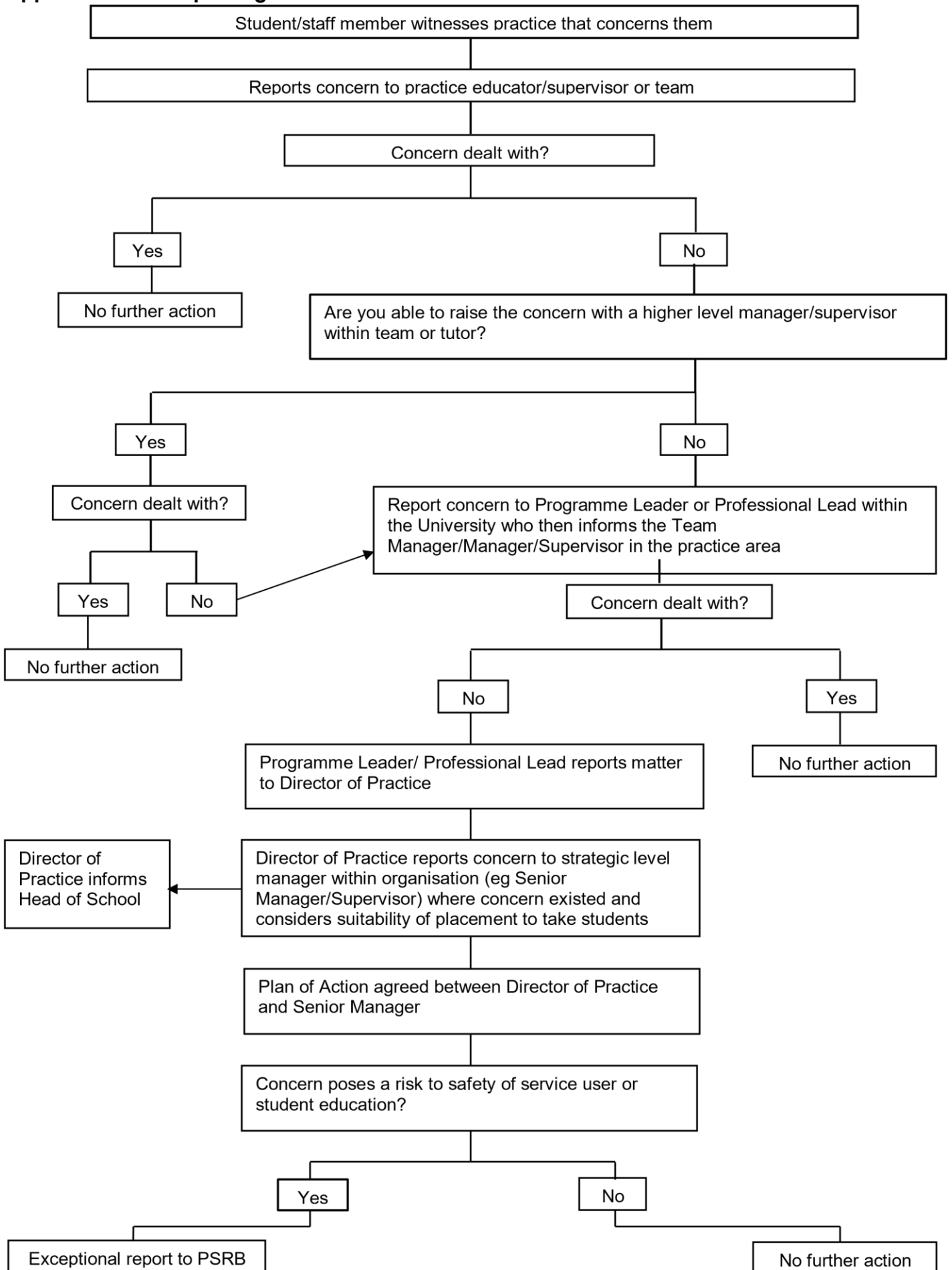
Nursing and Midwifery Council .2018. *The Code: Professional standards of practice and behaviour for nurses, midwives, and nursing associates*. London: Nursing and Midwifery Council

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## Appendix B Reporting Concerns in Other Placement Environments





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**Exceptional Report - PSRB Template**

Date of Report:

Name of organisation:

Cause for concern

Risk to students.

Risk to service users

Action taken

Follow up required

Signed:

Position:

Date:

## Appendix D

### Guidance for Nursing and Midwifery Council (NMC) Regulated Programmes

Approved Education Institutions (AEIs) should exceptionally report risks to the student learning environment that may affect compliance with the NMC education standards.

An exceptional report should be made when:

- there's an immediate or impending risk to the safety of students, members of the public or patients
- an unexpected or unexplained death has occurred
- a major incident has occurred
- a placement provider partner has been rated as "inadequate" by the Care Quality Commission (CQC), Health Inspectorate Wales, Healthcare Improvement Scotland or Regulation and Quality Improvement Authority - you do not need to do this if they have been rated by the CQC as "requires improvement"
- significant concerns have been raised by a member of the public  students have raised any complaints leading to an internal investigation
- there's significant public interest in the incident.

If a risk is reported, the NMC Template must be used and sent to [exceptional.reporting@nmc-uk.org](mailto:exceptional.reporting@nmc-uk.org)

**The Exceptional Reporting Template can be downloaded from the NMC website and example of the form can be found in Appendix E.**

Please refer to NMC (2019) guidance on 'How to exceptionally report a risk', accessed via: <https://www.nmc.org.uk/education/quality-assurance-of-education/how-we-monitor-education><https://www.nmc.org.uk/education/quality-assurance-of-education/how-we-monitor-education-institutions/exceptionally-report-a-risk/institutions/exceptionally-report-a-risk/>



# Exceptional Report Form



You must use this form to exceptionally report on any risks that may affect compliance with any of our education standards. This form is used for all risks to NMC approved education, across the theory and practice components of the approved programme.

<b>Section one: Risk owner information</b>	
<b>Name of approved education institution:</b>	
<b>Name of practice learning partner(s) involved (if applicable):</b>	
<b>Date of escalation to the NMC:</b>	
<b>Name of the person responsible for escalation to the NMC:</b>	
<b>Preferred contact email for follow up:</b>	

<b>Section two: Details of the risk</b>	
<b>Date of incident/concern/issue:</b>	
<b>NMC approved programme(s) impacted:</b>	
<b>Description of the risk identified:</b>	
<b>How were the AEI made aware of this risk:</b>	

**How many students are affected by the risk?** *(Please add rows to the table)*

<b>Programme</b>	<b>Year of study</b>	<b>Number of students</b>

**Is there a known or potential risk to safety?** *(Please add rows, if necessary)*

<b>Stakeholder</b>	<b>Yes/No</b>	<b>Details of the risk(s) identified</b>
Patients/public		
Students		
Staff		

**What impact does/could the risk have on compliance with our education standards?**

### Section three: Mitigation of the risk

**What immediate actions have been taken to address the risk(s)?**

**Does this risk impact on any other AEs?** *If so, please list the AEs impacted and state whether this risk been shared with them.*

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**What actions are now being planned to address the risks?**

### Returning your exceptional report

You must submit your completed form to [exceptional.reporting@nmc-uk.org](mailto:exceptional.reporting@nmc-uk.org) in a timely manner.

If you wish to add additional information to a report, you can do so by email directly to the [exceptional.reporting@nmc-uk.org](mailto:exceptional.reporting@nmc-uk.org) mailbox, without needing to complete a new form.

## Appendix F: Process Withdrawing a Placement from the Circuit

The decision to remove a placement from the practice circuit would be in exceptional circumstances when significant patient safety concerns are raised and/or threats to student learning. This action would lead to the completion of an NMC exceptional report/other professional body report, as appropriate.

The process for '*Escalating Concerns*' and the '*Raising Concerns about Poor Practice*' Policy is followed. Risks to patient safety and student learning are identified and escalated to the Director of Practice (DoP) and Director for Trust/Placement area in accordance with the flowcharts. A decision is made to escalate the risk to the professional body.

DoP contacts DoP or equivalent at Leeds Beckett University and Leeds Trinity University as well as the UoL Lifelong Learning Centre to inform of the identified risks, the decision to escalate the risk to the professional body and to discuss the decision to remove students from the placement.

If a decision to remove students from the placement is made, this will be escalated in accordance with the '*Raising Concerns*' flowchart to the professional body as part of the exceptional reporting process. The Director of Student Education and Head of School in the School of healthcare at University of Leeds will be informed.

DoP contacts the Senior Student Education Service Officer in the Practice Placement Unit for details of all students who are placed in the area. The Practice Learning Facilitator and Liaison Lecturer are informed and students are notified and withdrawn with immediate effect from the placement. The placement is disabled from the database until further notice and an action plan formulated.

If there are students from other Universities on the placement, the DoP notifies the DoP/Official Correspondent/Professional Lead at the appropriate University that threats to students learning and/or risks to patient safety have been identified and the decision has been taken to remove students from the placement.

Students are notified of the change of placement by their University and provided with support as appropriate. Students may be asked to provide additional information or statements as part of an ongoing investigation and will be supported by the University to do so.

The outcome of any investigation will determine subsequent actions for the placement. The area will be reviewed in terms of suitability to return to the circuit once actions are complete and the risk is removed.

The area will require an educational audit to be completed by the Liaison Lecturer/Programme Team member including review of CQC reports. Once complete, student placements may commence and be managed with support from the University and Educational Lead for the placement.

The area may be subject to close scrutiny in supporting student learning and this may be part of ongoing actions. The exceptional report and decision to remove students will be reported and monitored as part of the remit of the Practice Placement Quality Group.