

Raising and Escalating Concerns on Placements

Version 1

Policies superseded by this version

This document replaces the previous School of Health and Psychological Sciences (City University) Policy, Raising and Escalating Concerns, approved by Board of Studies and effective from 13/02/2024.

Summary of changes to previous version

The policy has been re-written following a review due to *merger* between City and St George's Universities, to ensure harmonisation across all relevant programmes within the School of Health and Medical Sciences. This is thus presented as a new policy, as the first within the new combined school. A summary of key changes from the legacy City policy was presented separately at the time of consultation and launch.

Table of Contents

1 Introduction	1
2 Freedom of Speech and Academic Freedom	2
3 Equality, Diversity and Inclusion	2
4 Definitions	2
5 Policy	2
6 Procedure.....	5
7 Advice and guidance	5
8 Failure to comply.....	5
9 Review	6

1 Introduction

- 1.1 This policy and procedure applies to all Programmes within the School of Health and Medical Sciences leading to registration with a Professional, Statutory and Regulatory Body (PSRB) e.g. British Psychological Society (BPS), General Optical Council (GOC), General Medical Council (GMC), Nursing & Midwifery Council (NMC), Health and Care Professions Council (HCPC). It is intended to ensure significant incidents or concerns on placement are dealt with fairly, consistently, effectively and in a timely manner, in accordance with the School of Health and Medical Science's, Professional Statutory Regulatory Bodies (PSRB) and the NHS England Workforce Training and Education (NHSE WTE) requirements and regulations.
- 1.2 This policy outlines the process to be followed when either a student, clinical placement staff member or University staff member, observes or is involved with unsafe or unprofessional practice in a placement setting. It is designed to provide clear guidance and support for students, University staff and clinical placement staff in raising and escalating significant concerns, and in reporting incidents of unsafe or unprofessional practice within a placement. All have a duty to report any concerns which put the safety of the patients, staff or the public at risk.

2 Freedom of Speech and Academic Freedom

- 2.1 City St George's, University of London, regards freedom of speech and academic freedom to be fundamental to delivering its mission as the University of business, practice and the professions. Its values in this respect are set out in a code of practice on freedom of speech and academic freedom, which explains how the University will uphold, secure, and promote freedom of speech within the law.
- 2.2 Nothing in this policy should be interpreted in any way that would be inconsistent with the code of practice and – in the event of any inconsistency – the provisions of the code will prevail.

3 Equality, Diversity and Inclusion

- 3.1 City St George's, University of London works to advance equity, diversity and inclusion in its activities, processes, and culture, for the whole University community, including staff, students and visitors.
- 3.2 The University will meet its obligations under the Equality Act 2010 in its policies and seek to eliminate discrimination on the basis of age, disability, neurodiversity, sex, gender reassignment, gender identity, marital status, pregnancy, caring responsibilities, sexual orientation, race, nationality, ethnic origin, religion and belief and socio-economic background.

4 Definitions

- 4.1 The school has a number of programmes with a practice component which uses various terminologies in relation to staff who educate and support students in a placement setting. For clarity and consistency, the policy and process use the following:
- 4.2 Clinical and Community Placements - A PSRB placement is a period of supervised, practice-based learning that takes place within a setting approved by a *Professional, Statutory and Regulatory Body (PSRB)*
- 4.3 School – School of Health and Medical Sciences
- 4.4 Student – individuals enrolled on a professionally accredited programme and undertaking a period of supervised, practice-based learning in a setting approved by the relevant Professional, Statutory and Regulatory Body (PSRB)
- 4.5 University – refers to City St George's, University of London

5 Policy

5.1 Purpose

To ensure significant incidents or concerns on placement are dealt with fairly, consistently, effectively and in a timely manner, in accordance with the school's, Professional Statutory Regulatory Bodies (PSRB), NHS England Workforce Training and Education (NHSE WTE) requirements and regulations.

5.2 Scope

The aim is to ensure that City St. George's, University of London meets its legal and statutory requirements to allow the facilitation of reporting concerns observed in a placement, and to have a mechanism in place to address and escalate these concerns where appropriate, whilst working in partnership with placements.

5.3 Principles

- 5.3.1 The Policy outlines its general principles and purpose and should be read in conjunction with the Raising and Escalating Concerns Procedure which sets out the process by which this Policy will be

applied and accompanying guidance and policies which aims to facilitate the use of the Policy and Procedure. The Policy should be used in conjunction with the relevant PSRB codes, standards and requirements, and the University Senate Regulations.

- 5.3.2 The school will at all times consider the most appropriate process to be followed when managing significant incidents or concerns on placement.
- 5.3.3 All healthcare professionals and students must raise concerns where there is a professional duty concerning patient or public safety or care is being compromised, whether by colleagues, systems, policies, or organisational procedures as stated by their relevant PSRB. The University and Placement Provider must encourage a culture in which staff and students can raise concerns openly and safely without disclosure of identifiable patient information. Reporting concerns does not override confidentiality obligations unless there is a legal or ethical justification (such as safeguarding or preventing serious harm).
- 5.3.4 Individuals raising concerns are not required to identify themselves. Concerns may be submitted anonymously, and all reports will be reviewed and acted upon in accordance with established procedures, regardless of whether the individual reporting chooses to disclose their identity. Although anonymity is fully supported, providing a name can be essential to clarify details or following up where further information may strengthen the investigation. Willingness to raise concerns, transparency, and openness are also important values for healthcare professionals. Without a name, whilst the concern will still be recorded, this may limit scope of investigation and potential for change where required.
- 5.3.5 The policy will be operated in accordance with the University's duties under the Equality Act 2010, the Data Protection Act 2018, and Freedom of Information Act 2000. Staff operating this policy should refer to the relevant process accompanying document.
- 5.3.6 The information in this Policy is correct at the time of review in April 2026. The school reserves the right to make amendments to the Policy, provided that any amendments are made in accordance with applicable law and regulatory duties and do not reduce protections for lawful freedom of speech or academic freedom. Amendments may be made where they are: (i) required by changes to Professional, Statutory and Regulatory Body regulations; (ii) required as a result of unforeseen events or circumstances beyond the University's control; or (iii) reasonably necessary for legitimate operational, legal, or regulatory reasons.
- 5.3.7 In the event that amendments are made, the University shall take reasonable steps to notify relevant parties as soon as is reasonably possible and, where changes materially affect the exercise of freedom of speech or academic freedom under this Policy, will apply the relevant governance and approval processes to ensure alignment with the University's Code of Practice on Freedom of Speech and Academic Freedom.
- 5.3.8 The school understands that raising concerns in placements can be difficult, and the School of Health & Medical Sciences is committed to ensuring that raising concerns in placement does not impact a student's learning outcomes. Additional support is available for students and staff who will be clearly signposted to this.

5.4 Roles and responsibilities

5.4.1 School Governance

- 5.4.1.1 It is a regulatory requirement for City St George's, University of London to have a reporting system to raise concerns and serious incidents, and governance structures to ensure appropriate reporting back to NHSE (or equivalent) and PSRBs on a regular basis.

- 5.4.1.2 The school's Practice Education Committee (PEC) is responsible for reporting and monitoring the escalation of concerns raised in practice. The collated log of reported concerns will be reviewed by PEC as a standard agenda item. PEC will monitor trends and ensure the quality and consistency of action plans. Reports may also be submitted to NHSE (or equivalent), PSRBs and escalated within the school and University in line with statutory requirements and university policies/procedures.
- 5.4.1.3 The log for the relevant Programme must be discussed and monitored at school level governance for practice, such as the Practice Advisory Board (or its equivalent). The Associate Dean for Partnerships and Placements, who serves as Chair of PEC, will report identified trends at each meeting of the Board of Studies (BoS) and will provide an annual summary report.
- 5.4.1.4 Additionally, because practice contributes to the assessment of students, it may be appropriate for some concerns to be recorded on the Assessment Board Risk Register. Any such concern would be shared without identifiable details and never be to the detriment of students but to ensure awareness in the event of mitigating circumstances affecting a cohort/group of students.
- 5.4.1.5 If the concern is of a serious nature and deemed necessary, it will be immediately escalated to Associate Dean for Partnerships and Placements (or nominee) for reporting to NHSE and the relevant PSRB and CQC within three days.

5.4.2 Student

- 5.4.2.1 Students training to enter the healthcare profession have an obligation to immediately report any serious concerns that may place the safety of patients or the public at risk. Students should immediately follow relevant local policy and processes within the placement setting when raising or escalating serious concerns observed in practice. Students are also required to ensure that they have raised the concern via [Report and Support](#) system at the University.
- 5.4.2.2 Students should also refer to the relevant PSRB guidance on raising concerns or whistleblowing; links to these resources are provided in Appendix C. If a concern relates to freedom of speech or academic freedom, the University's Code of Practice on Freedom of Speech and Academic Freedom and its associated procedures should also be followed.
- 5.4.2.3 Failure to report concerns that later come to light may call a student's fitness to practice into question and could place their continuation on the programme at risk. If a student experiences any negative reactions within a placement after raising a concern appropriately, they must contact a relevant member of university clinical placement staff or academic advisor for support and advice. The School of Health & Medical Sciences will provide support throughout the process.
- 5.4.2.4 Students may also raise serious concerns with their appropriate PSRB. Students can also raise serious concerns directly with the Care Quality Commission (CQC), which is the independent regulator of health and social care in England. The CQC can be informed about concerns even if the complainant does not want to complain about the service.

5.4.3 Placement Providers

- 5.4.3.1 Practice staff working in the healthcare sector have a duty to report any concerns that place the safety of patients or the public at risk, following the policy most relevant to their profession.
- 5.4.3.2 Clinical placement providers should immediately follow relevant local policy and processes within the placement setting when raising or escalating serious concerns observed in practice. Clinical staff are also required to ensure that either the student or staff member raises the concern via University [Report and Support](#) system.
- 5.4.3.3 This policy is not intended to address situations where a practice member of staff has concerns about a student's conduct or practice. These should be handled via usual feedback to the student in the first

instance, or for serious or repeated concerns escalated to university clinical placement staff or the Programme Director. If, following discussion, the concerns require further investigation, there are separate university policies and processes in place to support this such the Professionalism, Support and Reflection plan, and/or Fitness to Practice policy.

5.4.4 School

- 5.4.4.1 The school is responsible for implementing and complying with the Raising and Escalating Concerns in Practice Policy.
- 5.4.4.2 Academic and professional staff working in the higher education sector who support students in health and social care placements have a duty to report any serious concerns that could impact on safety, in accordance with the school's policy on raising and escalating concerns in practice. Staff must facilitate, support, and provide guidance to students throughout the process of raising or escalating a concern.
- 5.4.4.3 The school is also responsible for reporting relevant issues to internal governance structures and external regulatory bodies, such as the Professional Statutory and Regulatory Bodies (PSRBs), the Care Quality Commission (CQC), and Health Education England (HEE).

5.4.5 Internal and External Reporting

- 5.4.5.1 Data will be collected and reviewed by the Practice Education Committee, and reported to other relevant committees including SHMS Board of Studies at least annually.
- 5.4.5.2 It is a requirement of NHSE WTE for City St George's, University of London to maintain a reporting system for raising concerns and serious incidents. This system is managed by the University, and the Associate Dean for Partnerships and Placements reports the data to NHSE on a monthly basis.
- 5.4.5.3 If a concern is of a serious nature and deemed necessary, it will be reported to NHSE, the relevant PSRB, and the CQC within three working days by the Associate Dean for Partnerships and Placements.
- 5.4.5.4 If a practice member of staff has concerns about a student's conduct or practice, they should initially liaise with the relevant University staff member and/or the Programme Director. If, following discussion, the concerns require further investigation, they should be addressed through the Reflection and Development (RAD) Plan or the Fitness to Practice (Train) Policy.

6 Procedure

- 6.1 This is outlined in Appendices A (written) and B (flowchart)

7 Advice and guidance

- 7.1 Relevant Programme Directors can be contacted for advice and guidance. If further support is required, the Academic Director for Practice and the Associate Dean for Partnerships and Placements may also be contacted as points of reference.
- 7.2 Contact details for appropriate staff to contact within the University for advice and guidance regarding how to comply with the policy / follow any procedure are provided in Appendix C.

8 Failure to comply

- 8.1 It is a regulatory requirement for City St George's, University of London to have a reporting system to raise concerns and serious incidents, which is managed by the Practice Education Committee and reported back to NHSE (or equivalent) and PSRBs on a regular basis by the Associate Dean for Partnerships and Placements. Failure to comply, could involve the University being non-compliant with

legislation or regulation. Failure for a student to report concerns that later come to light may call a student's fitness to practice into question and could place their continuation on the programme at risk.

9 Review

- 9.1 The Policy and Procedure will be reviewed annually at PEC, and where changes beyond the names of responsible individuals are considered necessary, these submitted for approval by the Board of Studies and Senate.

Policy information

Should you require further information regarding this policy or access to the policy in an alternative format, then please contact SHMSquality@citystgeorges.ac.uk

Policy Title:	Raising & Escalating Concerns on Placements
Policy Version:	1
Primary Author:	Hannah Cock, Associate Dean Partnerships & Placements SHMS
Related Policies:	Professionalism, Support and Reflection Plan; Fitness to Practice and Train;
Accountable Authority:	EQC and Senate
Approving Authority:	 Professor Natalie Armstrong
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Policy effective from:	01/08/2026
Date of Review:	Annual via Practice Education Committee, updated as needed

Appendices:

A Process (see separate document)

B Process Flow Chart (see separate document)

C Contact details (2026-27 Academic year) & PSRB Links.

Academic Directors for Practice:

Where there are two ADPs covering a department, each will provide cross cover for the other in case of absence, though with primary responsibilities as listed. The ADPP has oversight of all areas.

- Allied Health Practice - PracticeADAHP@citystgeorges.ac.uk
 - Physio, OT, SLT - Annette Coomer
 - Diagnostic Radiography, Therapeutic Radiography, Paramedic Sciences – Jade Fleet
 - Healthcare Sciences – both
- MBBS & Physicians Associate
 - Primary Care and Community – Nicola Buxton nbuxton@citystgeorges.ac.uk
 - Secondary Care - Laura Byrne lbyrne@citystgeorges.ac.uk
- Nursing & Midwifery adpnursingmidwifery@citystgeorges.ac.uk
 - Adult & Mental Health Nursing - Asma Ashraf
 - Nursing & Midwifery (Child Nursing & Midwifery) – Patricia Burrows
- Optometry – Miriam Conway miriam.conway.1@citystgeorges.ac.uk
- Psychology – Paula Corcoran paula.corcoran.1@citystgeorges.ac.uk

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