Raising Concerns

UCL Medical School Guidance for the reporting and management of harmful behaviours in the University and NHS Placement Providers

MBBS Quality Assurance and Enhancement Unit

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Introduction

UCLMS expects the highest standards of conduct and professionalism from staff and medical students and takes a zero-tolerance approach to harmful behaviours and discrimination of any kind. UCLMS works within UCL and NHS policies in place at our clinical providers to protect staff and medical students from unacceptable behaviour at the university and during clinical placements.

We understand that raising concerns can be challenging for students and our aim, through this guidance, is to signpost students to UCL's Report + Support platform for concerns about students and university staff members, create transparency about how concerns about NHS employees are managed, and set out how UCL Medical School seeks to support students through UCL and NHS procedures to ensure that medical student concerns are heard and addressed through the most appropriate channel. At the MBBS Quality Assurance and Enhancement Unit (QAEU), we aim in particular to manage concerns raised by medical students regarding NHS staff who contribute to the MBBS programme, providing a bridge between the University and NHS Placement Providers and NHS employees who contribute to MBBS teaching. The QAEU will advise students how a formal case may be made and provide support and guidance throughout the process should they wish to proceed. . Where concerns of a serious nature relate to potential patient safety or potential criminal acts, Students are reminded of their professional responsibilities in raising concerns and providing necessary information for investigation.

Effective and supportive mechanisms for raising concerns during clinical training would not be possible without the invaluable contributions from the Senior Leadership Team, Student Support Services and the Equality, Diversity and Inclusivity Group. We also wish to thank our MBBS Undergraduate Site Leads for their support, without which, we would not be able to formulate and implement these steps to protect our students.

Initial Authors: Rima Chakrabarti, John Hines and Kavita Jaidev

Edited in 2023 by Vicki Cowling and Gaynor Jones

Edited in 2024 by Lettie Smythers and Gaynor Jones

John Hines
QAEU Academic Lead

Abbreviations

Academic Student Records	ASR
Clinical and Professional Practice	CPP
Gendered Violence	GV
General Medical Council	GMC
Higher Education Institution	HEI
MBBS Quality Assurance and Enhancement Unit	QAEU
MBBS Quality Management and Enhancement Committee	mQMEC
MBBS Senior Leadership Team	SLT
University College London	UCL
University College London Medical School	UCLMS

Guidance

1. Scope of Guidance

The scope of this guidance covers any concerns about harmful behaviours including Gendered Violence (GV) reported to the Medical School through UCL's Report to Support Platform or raised through the UCLMS Raising Concerns Platform by medical students, described here as the 'Reporting Party', about members of staff employed by UCL or UCLMS' clinical providers or patients at UCLMS's clinical providers, 'Reported Party', regardless of the location of the incident, including social media. The guidance draws on UCL terminology for gendered violence, which is also known as Gender-Based Violence (GBV).

UCL's Report + Support Platform is designed to facilitate the reporting by university staff and students and subsequent management of harmful behaviours. Incidents involving staff are directed to the appropriate departmental manager, who, for the majority of staff who contribute to the MBBS, will be outside the Division of UCL Medical School. Should a concern proceed to a formal stage, investigation is conducted under UCL's Staff Grievance Procedure. Incidents involving students are directed unedited to the MBBS Divisional Tutor and concerns which proceed to a formal stage are investigated under UCL's Student Disciplinary Procedure. This procedure falls outside the scope of this guidance (see section 1.4).

UCLMS' Raising Concerns platform is designed to facilitate the reporting and resolution of concerns that involve staff or events during clinical placements at NHS sites. Should a concern proceed to a formal stage, investigation is conducted under the procedures in place at each Placement Provider and may involve interaction with the GMC.

For simplicity of use we ask students in years 1-3 to use UCL's Report + Support Platform and students in years 4-6 to use UCLMS' Raising Concerns Platform and acknowledge that at times information will need to be shared between these 2 platforms or with the divisional tutor to ensure it is investigated appropriately.

QAEU aims to support students engaged in the staff-related procedures through review on an individual case basis and will liaise as needed across platforms, maintaining confidentiality within the teams above and informing the reporting party of this onward referral.

Concerns may be reported anonymously or with contact details. Choosing to report anonymously means we might not be able to help you directly and formal action cannot be taken. However, concerns can be logged to inform prevention work and may therefore help others. Choosing to report with contact details means we can provide advice and support about informal and formal approaches to resolution.

1.1 The Reported Party includes:

- Faculty members employed by UCL.
- All healthcare workers (eg Consultants, Doctors in training and SAS/LED Doctors, Nurses, Physiotherapists, Porters) at UCLMS' clinical providers including Trusts, GP practices and community placements.

1.2 UCLMS' GP and Trust Placement Providers, the largest of which are:

- Basildon University Hospital
- Lister Hospital, Stevenage
- Luton & Dunstable University Hospital
- North Middlesex University Hospital
- Royal Free London NHS Foundation Trust (Barnet, Chase Farm and Royal Free Hospitals)
- University College London NHS Foundation Trust
- Watford General Hospital
- Whittington Hospital

1.3 A list of key contacts at UCLMS is provided in on the raising concerns webpage: https://www.ucl.ac.uk/medical-school/current-mbbs-students/qa-enhancement-unit/raising-concerns.

1.4 Concerns raised by students against students are subject to UCL's Student Disciplinary Code and Procedure in Respect of Students[1]. Medical Students may

discuss concerns with the QAEU team for advice about the process, however this procedure is managed through the Divisional Tutor's Office.

2. Dignity at Work and Professional Codes of Conduct

2.1 UCL employees are expected to adhere to UCL's Prevention of Bullying, Harassment and Sexual Misconduct Policy, which sets out expectations of behaviour in the workplace and incorporates clear messages about zero tolerance towards harassment and bullying[2]. UCL's institutional mechanism for students to raise concerns is through Report + Support and formal complaints are addressed through UCL's Staff Grievance Policy.

2.2 All healthcare workers are expected to adhere to the professional standards set out by their regulatory body and by their employer's policies and values. For healthcare workers and medical students this includes a professional responsibility to act with integrity and to raise and escalate concerns about bullying and harassment[3,4]. UCLMS' Raising Concerns Platform provides the mechanism for medical students to raise concerns and to enable UCLMS to seek resolution informally or support medical students in submitting a formal complaint through the employer.

3. Raising Concerns

3.1 The first disclosure constitutes the Reporting Party sharing details of the concerning event, either verbally or through written communication. This can be between peers or with members of staff at UCL and UCLMS[5] or with members of staff at the Placement Provider

3.2. At UCLMS, there are several options with whom the Reporting Party can make the first disclosure including:

- Student Support, CPP and Personal Tutors
- Director of Undergraduate Medical Education (Primary Care and Community)
- Year Leads
- Module Leads

QAEU At UCL, this includes:

- Dignity Advisors

- Report + Support
- Student Support and Wellbeing services

At Placement Providers this includes:

- Director of Undergraduate Medical Education (Central Trusts)
- Undergraduate Tutors
- Site Senior Tutors (Central Trusts)
- Personal Tutors
- Educational Supervisors
- Freedom to Speak up Champions

3.3 At the first disclosure, the Reporting Party should be encouraged to submit their concern in writing either to the QAEU through the 'Raising Concerns' form or to UCL Report + Support.

3.4 In the event that the concern is raised directly with a member of staff at the Placement Provider, we would ask the student to inform the Academic Lead for QAEU also.

3.5 The Reporting Party cannot be required to make a formal submission but in the event that the *disclosure relates to criminal activity, there is a duty of care for the details of the incident to be escalated to either UCL Report & Support or to QAEU.*

3.6 The QAEU is responsible for checking for Raised Concerns forms on a regular basis, excluding public holidays and university closures.

3.7 For all *non-anonymous* concerns, the QAEU Associate Lecturer and/or QAEU Manager will aim to meet the Reporting Party at a convenient date and time. The Reporting Party will have the option of either meeting remotely or face to face.

3.8 All *anonymous* concerns will be logged by the QAEU (Outlined in Section 8), with escalation depending on the nature of the concern raised (Outlined in Section 6).

3.9 A flowchart summarising the management of concerns is provided on p15 of this policy.

3.10A list of GV related concerns is provided in Appendix B.

4. Meeting Students

4.1 The main aim of the QAEU is to ensure that the Reporting Party is safe both physically and psychologically. While the events surrounding the raised concern will be explored in more detail during the initial meeting, the Reporting Party will also be directed to the appropriate resources for their care (Appendix A).

4.2 During the meeting, the next steps of managing the concern raised will be outlined and their point of contact at the QAEU.

5. Supporting the Reporting Party

5.1 The QAEU may consider that adjustments could be helpful in supporting the student, in which case this should be discussed with the Divisional Tutor, who will take the matter further if appropriate, liaising with relevant staff.

5.2 The QAEU will remain the central point of contact for all raised concerns. The Reporting Party will not be contacted directly by anyone outside the QAEU unless consent has been gained or there are safeguarding concerns (see below). The right to confidentiality is vital for the Reporting Party and therefore:

- any details that may need to be shared and with whom will be made clear to the Reporting Party prior to doing so.
- agreement for any adjustments to the student's programme of study/placements will be documented in ASR through the Medical Student Support Manager.

5.3 In exceptional circumstances, if it is considered that there is either a direct risk to the Reporting Party or to others, then information may be shared with the relevant parties for safeguarding purposes prior to informing the Reporting Party. This includes,

- Next of kin
- Police
- Mental Health Crisis teams
- HR Business partner and the Crime Prevention and Safety Officer at Central UCL
- Divisional Tutor
- Responsible Officer of NHS provider

6. Escalation

This will depend on the nature of the concern raised and the role of the Reported Party and whether the concern is submitted as a formal complaint under the relevant Disciplinary Procedures. UCL Procedures require that informal resolution, where appropriate, is sought as a first stage and the Academic Lead for QAEU will lead the informal stages on behalf of UCLMS.

Harmful Behaviours

6.1 UCL Academic Staff

A meeting between the Academic Lead of QAEU and the Reported Party will be arranged to discuss the concern raised.

If the discussion confirms that conduct has fallen below the required standard and the concern is being managed outside of UCL's formal Disciplinary Procedure and this is the first concern raised about the Reported Party, the recommendation may suggest reflective practice. Awareness training including repeating Mandatory and Statutory Training (MAST) or EDI training may be recommended. The relevant Line Manager will be informed of the outcome.

If repeated patterns of behaviour are reported with no improvement despite previous recommendations, or if several concerns are raised about the Reported Party, then the QAEU will advise the student to submit a formal complaint and may recommend that the Head of the MBBS Programme requests the temporary removal of the Reported Party from MBBS educational activities pending the conclusion of the Disciplinary Process.

6.2 NHS Employees

The concern raised will be discussed with the members of staff who act as UCLMS' representatives/MBBS Coordinators under Health Education England and UCL's contracts with Placement Providers:

- Trust / Community Director of Undergraduate Medical Education
- Undergraduate Tutor
- Director of Undergraduate Medical Education for Community and Primary Care

These Placement Leads are responsible for managing concerns raised outside of formal Disciplinary Procedures, for liaising with the relevant Placement Provider Workforce personnel responsible for managing complaints raised formally under Disciplinary Procedures, and for liaising with the Academic Lead for QAEU and the Reported Party.

If the discussion confirms that conduct has fallen below the required standard and the concern is being managed outside of the Placement Provider's formal Disciplinary Procedures and this is the first concern raised about the Reported Party, the recommendation may suggest reflective practice. Awareness training including repeating Mandatory and Statutory Training (MAST) or EDI training may be recommended. The Placement Provider's Workforce personnel will be notified of the outcome and asked to include a review of conduct in annual appraisals.

If repeated patterns of behaviour are observed with no improvement despite previous recommendations, or if several concerns are raised about the Reported Party, or if the concern is of a serious nature, then the QAEU will advise the student to submit a formal complaint and liaise with the student and the Placement Provider's representative to facilitate this and may recommend that the Head of the MBBS Programme requests the removal of the Reported Party from MBBS educational activities pending the conclusion of any investigatory and/or disciplinary processes.

QAEU will facilitate the gathering of information from medical students and passing this information to the Placement Provider's representative to inform investigation.

At the conclusion of the investigation or disciplinary process, the Placement Provider's representative will inform the Academic Lead for QAEU of the completion of the investigation and/or outcome of any disciplinary process including any action relating to the Reported Party's contribution to the MBBS programme. To the extent that it is permitted in accordance with the Placement Provider's internal policies and confidentiality obligations, the Reporting Party may be informed by the Academic Lead for QAEU as to whether the concerns they raised were upheld, partially upheld or not upheld, and, if possible, the Reporting Party will be informed of any action relating to the Reported Party's contribution to the MBBS programme.

Gendered Violence

6.3 UCL Academic Staff

The Academic Lead for QAEU will alert the MBBS Senior Leadership Team and the involvement of the Police will also be considered, with the consent of the Reporting Party.

All gendered violence (GV) concerns will be escalated in line with UCL policies through the relevant HR Business Partner, Employee Relations Manager and the Crime Prevention and Personal Safety Adviser.

Precautionary measures that may be implemented at this stage include

- No contact arrangements- this is to create safe spaces where neither party will risk encountering each other.
- Temporary exclusions- the Reported Party may be excluded from certain events on campus.
- Suspension.

6.4 NHS Employees

The Academic Lead for QAEU will alert the MBBS Senior Leadership Team, Placement Provider's Representative and the relevant Chief Medical Officer/Medical Director. The involvement of the Police will also be considered.

- All gendered violence concerns will be escalated to the relevant Workforce Lead (e.g., Head of Corporate Services, Chief People Officer) and Responsible Officer. These will be managed as per local Trust policy.
- The Academic Lead for QAEU will discuss with the Placement Provider's Representative the timeline for managing the concern raised and the relevant parties will maintain ongoing communication throughout the process.

At the conclusion of the investigation or disciplinary process, the Placement Provider's representative will inform the Academic Lead for QAEU of the completion of the investigation and/or outcome of any disciplinary process including any action relating to the Reported Party's contribution to the MBBS programme. To the extent that it is permitted in accordance with the Placement Provider's internal policies and confidentiality obligations, the Reporting Party may be informed by the Academic Lead for QAEU as to whether the concerns they raised were upheld, partially upheld

or not upheld, and, if possible, the Reporting Party will be informed of any action relating to the Reported Party's contribution to the MBBS programme.Precautionary measures to protect the medical student that may be implemented at this stage via the relevant NHS Workforce Lead (e.g., Head of Corporate Services, Chief People Officer) or Managing Partner in a GP Practice include:

- No contact arrangements- this is to create safe spaces where neither party will risk encountering each other.
- Temporary exclusions- the Reported Party may be excluded from certain MBBS teaching or placement-based activities.
- Suspension/exclusion.

6.5 Patients

The Academic Lead for QAEU will alert the MBBS Senior Leadership Team, relevant Placement Representatives and Chief Medical Officer/Medical Director, who will alert the relevant Workforce Lead. involvement of the Police will also be considered for all GV concerns relating to patient conduct.

Precautionary measures that may be implemented by the clinical providers at this stage include:

- No contact arrangements - this is to create safe spaces where neither party will risk encountering each other.

7. Follow-up with Reporting Party

7.1 The QAEU will be responsible for maintaining regular contact with the case manager and the Reporting Party during the process. This includes communicating timelines in the management of the concern raised with the Reporting Party and when investigations or Disciplinary Procedures have concluded.

7.2 To the extent that it is permitted in accordance with the Employer's internal policies and confidentiality obligations, the Academic Lead for Quality Assurance may inform the Reporting Party as to whether the concerns they raised were upheld, partially upheld or not upheld, and, if possible, the Reporting Party will be informed of any action relating to the Reported Party's contribution to the MBBS

programme.7.3 In the event that the Reporting Party is unhappy with the outcome of informal measures taken under this policy outside of formal Disciplinary Procedures, they will be directed to either the

- Student Mediator (University employees)
- Chief Medical Officer/Medical Director at the relevant site for healthcare workers (NHS employees).

7.4 For all *anonymous concerns* raised, follow up and feedback will not be possible by the QAEU.

8. Governance

8.1 All concerns raised will be logged under a unique ID by the QAEU.

8.2 The log of concerns will be kept updated and maintained by both the Manager and Associate Lecturer in QAEU.

8.3 The log of concerns along with the individual reports for each case will be kept in a restricted folder on the S Drive.

8.4 UCLMS members with access to the restricted folder on the S Drive include members of the QAEU, Director of the Medical School, Head of MBBS Management and Head of MBBS Management CPP and QAEU.

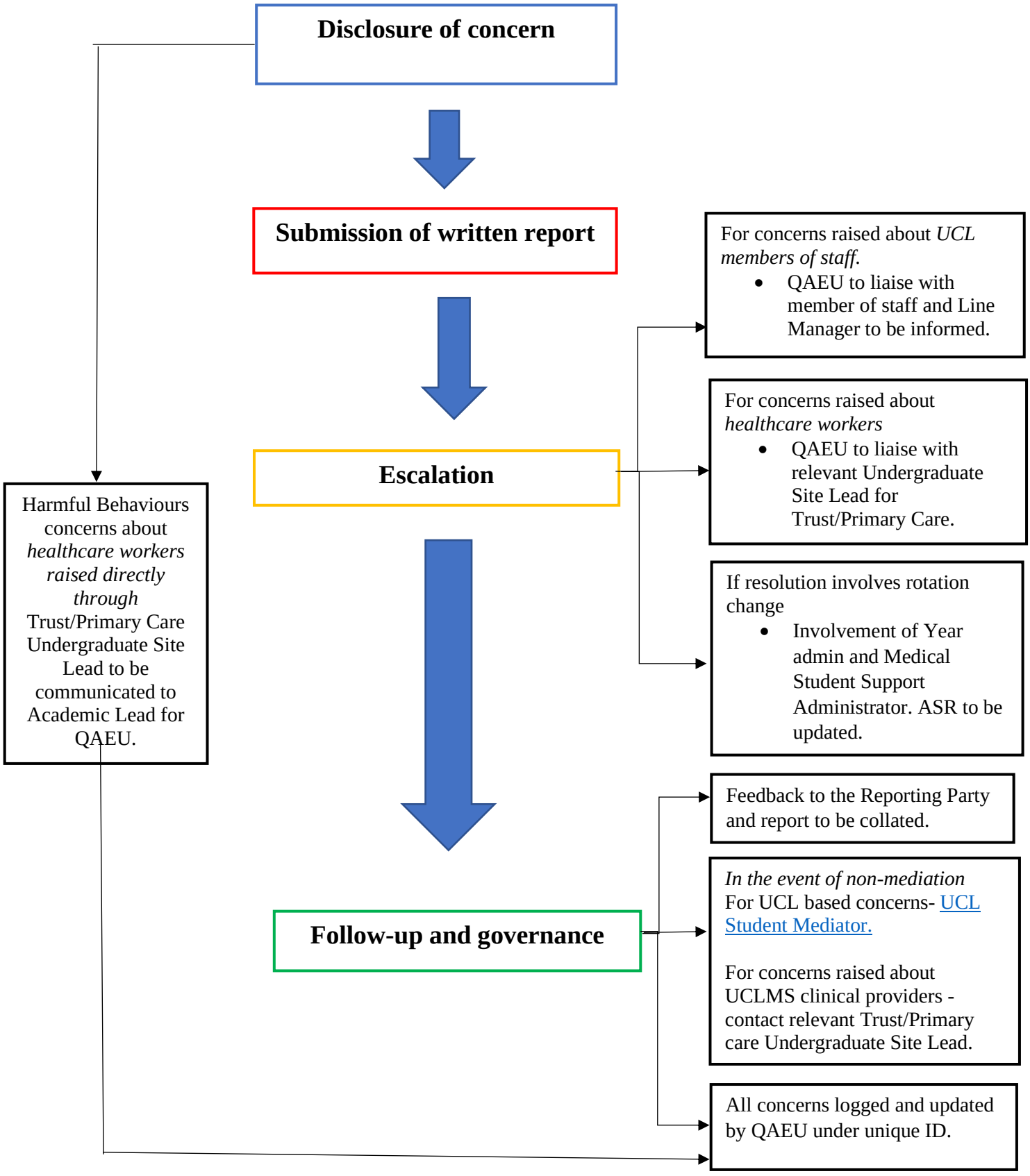
8.5 The QAEU and SLT will meet regularly to ensure that all concerns are being addressed and to explore further areas of interventions.

8.6 The QAEU will have meetings every term with the UCL Report + Support Administrator to discuss pan-collaborative initiatives for tackling concerns both centrally and at UCLMS.

8.7 An anonymised summary of all the concerns managed by QAEU for the previous Academic Year will be presented at the Term 1 mQMEC meeting.

Summary Flowchart

A. Management of Harmful Behaviours concerns



Summary Flowchart

B. Management of Gendered Violence (GV) concerns

Disclosure of concern or submission of written report

Any concerns raised, formally or informally, meeting the threshold of criminal activity will be automatically escalated to the relevant bodies.

Escalation policy

- Academic Lead of QAEU & SLT to be alerted
- Involvement of Police to be considered
- If concerns regarding safeguarding- UCLMS Student Support to be alerted to consider Fitness to Practice proceedings.

For GV concerns raised about *UCL Members of staff*.

- QAEU to liaise *with relevant HR Business partner/ Employee Relations Manager and Crime Prevention and Personal Safety Officer*.
- Incident and timeline for managing concern to be agreed and ongoing communication between all parties involved.

For GV concerns raised about *healthcare workers*.

- QAEU to liaise with relevant Trust/Primary Care Undergraduate Site Lead.
- Responsible Officer and Workforce Lead to be alerted by Trust/Primary Care Undergraduate Site Lead.
- Management of concern as per local Trust policy
- Incident and timeline for managing concern to be agreed and ongoing communication between all parties involved.

Involvement of Year Admin and Medical Student Support Manager as needed. ASR to be updated

Follow-up and governance

- Follow up with Reporting Party to ensure adequate support and to maintain contact.
- Case outcome to be communicated between relevant parties and QAEU.
- All concerns logged and updated by QAEU under unique ID.

References

[1] University College London (UCL). Section 8: Disciplinary Code and Procedure in respect of Students. Available from https://www.ucl.ac.uk/academic-manual/chapters/chapter-6-student-casework-framework/section-8-disciplinary-code-and-procedure-respect

[2]University College London (UCL). Prevention of Bullying, Harassment and Sexual Misconduct Policy Available from https://www.ucl.ac.uk/equality-diversity-inclusion/dignity-ucl/prevention-bullying-harassment-and-sexual-misconduct-policy

[3]General Medical Council (GMC). Good Medical Practice. Available from https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/good-medical-practice

[4]General Medical Council (GMC). Outcomes for Graduates. Available from https://www.gmc-uk.org/education/standards-guidance-and-curricula/standards-and-outcomes/outcomes-for-graduates/outcomes-for-graduates/outcomes-1---professional-values-and-behaviours

[5] UCL Medical School. Quality Assurance and Enhancement Unit. Raising Concerns. Available from https://www.ucl.ac.uk/medical-school/current-mbbs-students/qa-enhancement-unit/raising-concerns

[6] Equality and Human Rights Commission (EHRC). Tackling racial harassment: Universities challenged Available from https://www.equalityhumanrights.com/sites/default/files/tackling-racial-harassment-universities-challenged.pdf

[7] Humphreys, C.J. and Towl, G.J. (2020), "Developing a Sexual Violence Policy and Procedure", *Addressing Student Sexual Violence in Higher Education*, Emerald Publishing Limited, Bingley, pp. 69-88. Available from https://www.emerald.com/insight/publication/doi/10.1108/9781838671389

Appendices

Appendix A: List of Support Services and Resources

- UCL Carefirst
- Rape Crisis (ssw-comms@ucl.ac.uk)
- Student Support & Wellbeing Services (student.wellbeing@ucl.ac.uk)
- Student Psychological and Counselling Services
- UCL Report + Support: Support for students affected by gendered violence

Appendix B: Concerns related to GV[7]

- *Non-consensual sexual contact*: sexually touching another person without their consent.
- *Non-consensual sexual act*: engaging or attempting to engage in a sexual act with another person without their consent.
- *Sexual harassment:* any conduct of a sexual nature that is unwanted, including verbal, non-verbal and physical behaviour, which violates the recipient's dignity or creates an intimidation, hostile, degrading or offensive environment; this could be one incident or a pattern of behaviours. This definition represents the definition of sexual harassment under the Equality Act 2010 (Whitfield, 2018).
- *Online sexual misconduct*: The following examples of online sexual misconduct use definitions offered by Universities UK (2019a).
    - Cyberstalking: repeated and deliberate use of the internet and other electronic communication tools to engage in persistent, unwanted communication intending to frighten, intimidate or harass someone, or to spy on someone.
    - Image-based sexual abuse: (also known as 'revenge pornography') recording or sharing sexual or intimate photos or videos, without the consent of the person pictured.
    - Up skirting: filming or photographing under a person's clothes without their consent to capture images of their body or underwear.
- *Stalking*: persistent, unwanted communication or behaviour intending to frighten, intimidate or harass someone such as repeatedly following them.
- *Relationship abuse*: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those who are, or have been, intimate partners; this may include psychological, physical, sexual, financial and/or emotional abuse.