

Framework Organisational Requirements	Current Position	Planned Actions to Achieve Framework Expectations	Exec Lead	Target Date for Completion
6.1 Appoint, as mentioned earlier within this Framework, an Independent Member / Non-Executive Director as Speaking Up Safely Champion as well as an Executive Lead.	Public Health Wales currently has appointed the following as Raising Concerns Champions: <ul style="list-style-type: none"> <li>• Jan Williams, Chair - Non-Executive Director Champion</li> <li>• Paul Veysey, Board Secretary and Head of Board Business Unit - Executive Champion</li> </ul>	<p><b>1</b></p> <p>The role of Raising Concerns Champions has been extended to cover the full breadth of role outlined within the Speaking up Safely Framework.</p> <p>The Chair of the Board are both the Speaking Up Safely and Raising Concerns Champions.</p> <p>This position will be reviewed annually. Following the appointment of the Non-Executive Director with an Equality, Diversity and Inclusion portfolio, it is intended that the Non-Executive Director Champion role will be reallocated to this individual, with continued oversight by the Board Chair through the appraisal process.</p> <p>The Board will review the progress and effectiveness of the Board Champion roles through the appraisal process, and through a Champions Annual Report that will be presented to the Board in May each year.</p>	Board Secretary and Head of Board Business Unit	Completed.
6.2 Ensure adequate investment that provides sufficient resource to support the continuous development of the organisational Speaking Up Safely approach and associated culture change.	Initial assessment is there are sufficient resources based on working collaboratively with Board and Executive Business Unit, Communications, and People and OD.  This resource currently includes: <ul style="list-style-type: none"> <li>• Advocacy and support from the Non-Executive Board Champion.</li> <li>• Board Secretary and Head of Board Business Unit and team leads on Raising Concerns which will now extend to Speaking up Safely. This role will retain oversight and overall responsibility for implementation.</li> <li>• The Deputy Board Secretary will lead on the development of the Procedure, protocol and work collaboratively with People and OD colleagues to support implementation.</li> <li>• Director of People and Organisational Development to lead on the Culture actions, and the development of appropriate training tools and support for staff. This is in line with work already planned within the IMTP.</li> <li>• Support from the Communications Team for staff messaging.</li> </ul>	<p><b>2</b></p> <p>As the Framework is fully adopted, resources will be reviewed to ensure its effective implementation.</p> <p>Additional funding may be sought in relation to the implementation of the Culture Advocates programme to support staff to confidently and effectively support their teams and the wider organisation during our culture change programme.</p>	Board Secretary and Head of Board Business Unit / Director of People and Organisational Development	31 Mar 2024
6.3 Embed Speaking Up Safely in the functions of a board committee, which can be an existing committee, to support the champion / lead for	The People and Organisational Development Committee currently has remit for Raising Concerns within its Terms of Reference: <i>'The Committee will seek assurance on: ... 1.8 The management of whistle-blowing (raising concerns).'</i>	<p><b>3</b></p> <p>The Terms of Reference for the People and Organisational Development Committee will be amended to reference the framework. This will be submitted to PODC on 8 November and final approval to the Board on 30 November. As part of this review of the Committees Terms of Reference, there will be a discussion on the Group's Membership to</p>	Board Secretary and Head of Board Business Unit	30 Nov 2023

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speaking up in terms of guiding the organisation's approach. Membership of the committee should consist of a range of key stakeholders, including (but not limited to) some of those identified in Section 3.	<p>Membership of this Committee includes Trade Unions, HR, OD. The Non-Executive and Executive Raising Concerns Champions both attend/ are members of this group.</p> <p>The Committee considers an Annual Report on raising Concerns, which includes key data relating to any concerns raised (including EDI data) and would also summarise any thematic learning as a result of the process.</p> <p>At the opening of every Board Meeting, the Chair and Board Champion invites all in-appropriate behaviours to be called out.</p>	ensure the Committee is meeting the requirements and suggested stakeholders within the Framework.		
		<p><b>4</b> A summary of the role of PODC within the context of the framework will be provided to the Committee at its November meeting, as part of the Annual Report for Raising Concerns. This will outline the Committees role, and remit in providing assurance to the Board on the Organisation's approach and effectiveness in relation to speaking up safely.</p> <p>In future years, the Annual Report will be reframed to be an Annual Report on Speaking Up Safely and the Work programme will be updated accordingly.</p> <p>The PODC Terms of Reference will be updated to note that the Non Executive Champion for Speaking Up Safely should also be a Committee member.</p>	Board Secretary and Head of Board Business Unit	8 Nov 2023
6.4 Ensure that clear and easy to follow processes are in place to allow individuals to raise concerns (including anonymously). The NHS Wales Procedure for Staff to Raise Concerns is a necessary minimum standard but is not in itself sufficient for facilitating and supporting a Speak Up Safely culture.	<p>The Organisation has a clear process set out for all staff seeking to raise concerns and has adopted the All Wales Policy.</p> <p>This information is available to staff via the Raising Concerns Intranet page - <a href="https://phw.nhs.wales/about-us/policies-and-procedures/policies-and-procedures-documents/corporate-governance-communications-and-finance-policies/procedure-for-nhs-staff-to-raise-concerns/">Raising Concerns (sharepoint.com)</a>.</p> <p>The Adopted policies are available to staff and the public via the website: <a href="https://phw.nhs.wales/about-us/policies-and-procedures/policies-and-procedures-documents/corporate-governance-communications-and-finance-policies/procedure-for-nhs-staff-to-raise-concerns/">https://phw.nhs.wales/about-us/policies-and-procedures/policies-and-procedures-documents/corporate-governance-communications-and-finance-policies/procedure-for-nhs-staff-to-raise-concerns/</a></p>	<p><b>5</b> The staff intranet page will be reviewed and updated to ensure it meets requirements of the new framework - <a href="https://phw.nhs.wales/about-us/policies-and-procedures/policies-and-procedures-documents/corporate-governance-communications-and-finance-policies/procedure-for-nhs-staff-to-raise-concerns/">Raising Concerns (sharepoint.com)</a>.</p> <p>This review will ensure that the following are reflected:</p> <ul style="list-style-type: none"> <li>• The need to ensure anonymity into speaking up processes for those staff who fear detriment from publicly speaking out. This is currently contained within the Raising Concerns Process and will be made explicit on the intranet page.</li> <li>• Outline how to access staff support and wellbeing services</li> <li>• Map all of the available routes to speak up outlined within the act (Staff / HR processes, Counter Fraud, Safeguarding etc) to ensure it is all contained in a central location for ease of reference for staff.</li> <li>• FAQs and Toolkits from the Framework</li> </ul> <p>The intranet page will also be translated into Welsh to ensure colleagues can raise a concern in Welsh.</p>	Board Secretary and Head of Board Business Unit	30 Nov 2023
		<p><b>6</b> The Procedure will also be reviewed to ensure the requirements within the Framework are incorporated, and the All Wales Procedure will be updated and put forward for Board approval.</p>	Board Secretary and Head of Board Business Unit	30 Nov 2023

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6.5 Identify those groups which experience the most barriers when speaking up and ensure that processes are inclusive and equitable.	<p>Currently identified and addressed through the EqHIA of the NHS Wales Procedure for Staff to Raise Concerns.</p> <p>Assessment of current position is that we are aware of the current barriers and have identified affected groups. The ambition going forward is to remove or reduce these barriers as far as possible through further engagement with affected groups and additional support to staff.</p>	7	<p>The Procedure will also be reviewed to ensure the requirements within the Framework are incorporated, and the All Wales Procedure will be updated and put forward for Board approval.</p> <p>Review and update EqHIA associated with the Procedure as part of the approval/adoption of the new Framework.</p>	Board Secretary and Head of Board Business Unit	30 Nov 2023
		8	<p>Support and training materials for the following will be developed:</p> <ul style="list-style-type: none"> <li>• Support for affected groups via staff diversity networks – Ensure Exec Sponsors and Network Chairs are provided with guidance on the framework.</li> <li>• Support and advice from ED&amp;I SMEs such as ED&amp;I charities and groups.</li> <li>• Support and advice via People and OD – Ensure Advisors are provided with guidance on the framework.</li> <li>• Additional guidance under development regarding Respect and Resolution and addressing concerns related to protected characteristics. Could link to Procedure for Staff to Raise Concerns if related to discrimination or bullying of staff.</li> </ul> <p>Within these training materials, the focus will be on how support is provided to affected groups, and how any barriers to speaking up are overcome.</p>	Director of People and Organisational Development	31 Mar 2024
6.6 Ensure that the response mechanism / process is continuously monitored, clear and timely (equally as important as the procedure to raise concerns – see Toolkit 4).	<p>The Committee considers an Annual Report on raising Concerns, which includes key data relating to any concerns raised (including EDI data) and would also summarise any thematic learning as a result of the process.</p> <p>Current arrangements monitored by the Board Secretary.</p> <p>The Organisation has a clear process set out for all staff seeking to raise concerns and has adopted the All Wales Policy.</p> <p>This information is available to staff via the Raising Concerns Intranet page - <a href="#">Raising Concerns (sharepoint.com)</a>.</p>	9	Review any data from current monitoring arrangements against new Framework and Toolkit.	Board Secretary and Head of Board Business Unit	30 Nov 2023
		10	<p>Develop a <b>Speaking Up Safely Protocol</b>, which summarises the approach to monitoring Speaking up Safely which will include:</p> <ul style="list-style-type: none"> <li>• Summary of the <b>reporting arrangements</b> to the Board and how the Board gains assurance.</li> <li>• Summary of the <b>timings and frequency</b> of staff comms messaging / Comms Plan</li> <li>• <b>Summary of key stakeholders</b> and how each group has been supported.</li> <li>• <b>Internal process</b> for live cases to reference to meet the requirements within the Framework (such as the monthly check with the Policy Lead and People and OD Team., and Feedback fortnightly to the person speaking up.</li> </ul>	Board Secretary and Head of Board Business Unit	30 Nov 2023

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		<ul style="list-style-type: none"> <li>• <b>Support of individual/s:</b> How will their well-being be supported whilst they are awaiting any outcome?</li> <li>• <b>The interface of speaking-up with safeguarding and the management of professional concerns</b></li> <li>• <b>Speaking up and criminal activity:</b> Mechanisms to ensure clear opportunities to report criminal activity in relation to speaking up safely concerns. As with safeguarding, there must be the ability to establish where reporting to Police is an appropriate course of action.</li> <li>• <b>Options to raise a concern:</b> How will the concern be consistently heard and managed by these differing options, who will co-ordinate and ensure that any immediate concerns are managed effectively, who will manage the practical arrangements to reduce variation in approach and therefore impact and outcomes, and how any learning be made available to the organisation to act on?</li> <li>• <b>Learning form speaking up concerns:</b> It is really important that stories, learning, themes and trends, from whistleblowing and speaking up are analysed, triangulated and used to improve quality, safety, practices and services in the NHS.</li> </ul> <p>This then will form the basis of the Annual Report to PODC / Board on Speaking Up Safely to replace the current reporting on Raising Concerns.</p> <p>This protocol will be collaboratively developed with key stakeholders including those specified within the Framework (Trade Unions, People and OD and those representing minority communities.)</p> <p>The list of key stakeholders will be developed as the protocol is developed , which will include:</p> <ul style="list-style-type: none"> <li>• Staff Networks</li> <li>• Safeguarding Team</li> <li>• Trades Unions</li> <li>• Local Partnership Forum</li> <li>• Equality, Diversity and Inclusion Team</li> <li>• People and Organisational Development Team</li> </ul>		
6.7 Ensure that individuals speaking up do not suffer detriment	This is covered in existing framework documents, e.g. Appendix 2 of the NHS Wales Procedure for Staff to Raise Concerns - Protection of those making disclosures.	<b>11</b> Raise awareness of updated NHS Wales Procedure for Staff to Raise Concerns and Appendix 2 - Protection of those making disclosures (news story and training/ briefing	Board Secretary and Head of Board Business Unit	30 Nov 2023

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as a result of raising concerns.		<p>sessions). Details of regular Comms Plan and training will be summarised in the Speaking Up Safely Protocol.</p> <p>Within the protocol we will also be clear on the process should individuals feel they have suffered detriment as a result of raising a concern.</p> <p>News article to be published and promoted through the staff intranet page following the Board meeting in November.</p> <p>This will highlight key messages from the Framework including:</p> <ul style="list-style-type: none"> <li>• New Framework states: 'Victimisation or harassment of an individual for speaking up / raising concerns will be considered a serious disciplinary offence, as will any action to 'cover-up' or wilfully ignore concerns.' Any such action will be dealt with under the Respect and Resolution Policy and Processes.</li> <li>• That any staff experience detriment from speaking up, we will actively utilise restorative justice practices to address this, as per the All-Wales Respect and Resolution policy and process.</li> </ul>	Director of People and Organisational Development	
6.8 Undertake regular reviews of responses, as well as of the leadership and governance arrangements in place, and provide regular reports to the appropriate committee.	<p>The Committee considers an Annual Report on raising Concerns, which includes key data relating to any concerns raised (including EDI data) and would also summarise any thematic learning as a result of the process.</p> <p>Current arrangements monitored by the Board Secretary.</p> <p>The Organisation has a clear process set out for all staff seeking to raise concerns and has adopted the All Wales Policy. This information is available to staff via the Raising Concerns Intranet page - <a href="https://sharepoint.com">Raising Concerns (sharepoint.com)</a>.</p>	<p><b>12</b> Review procedure against framework to ensure we meet the requirements of the Framework and update intranet content.</p> <p><b>13</b> Summarise the leadership and governance arrangements in the Speaking Up Safely Assurance Protocol. This will include summary of how live cases would be managed and reviewed and a summary of how assurance is provided to the Board.</p>	Board Secretary and Head of Board Business Unit	30 Nov 2023
6.9 Ensure that arrangements are in place to monitor concerns / issues raised against the protected characteristics of the Equality Act 2010 and the implementation of any learning as a result of this.	The Committee considers an Annual Report on raising Concerns, which includes key data relating to any concerns raised (including EDI data) and would also summarise any thematic learning as a result of the process.	<b>14</b> Ensure monitoring of concerns/ issued raised includes details of protected characteristics (as per Equality Act, 2010) and reference this requirement in the process within the Speaking Up Safely Assurance Protocol.	Board Secretary and Head of Board Business Unit	30 Nov 2023
6.10 Request feedback from all individuals who have spoken up and	No current cases to request feedback from.	<b>15</b> Review procedure against framework to ensure we meet the requirements of the Framework and update intranet content.	Board Secretary and Head of	30 Nov 2023

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<p>evaluate the feedback received (consider inviting a sample of individuals who have spoken up to attend committees and Board meetings to discuss experiences and share learning).</p>			Board Business Unit	
		<p><b>16</b> Reference this requirement to seek feedback within the process within the Speaking Up Safely Assurance Protocol. This will include:</p> <ul style="list-style-type: none"> <li>• Design a suitable questionnaire to be issued to all individuals who have spoken up.</li> <li>• Requirement and an outline of the process to evaluate the feedback received.</li> <li>• Reference that a summary of thematic learning will be included within the Annual report to PODC</li> <li>• Outline the role of the Board Secretary Invite a sample of individuals to attend Board or consider as part of the wider staff engagement with PODC / Board.</li> </ul>	Board Secretary and Head of Board Business Unit / Director of People and Organisational Development	30 Nov 2023
<p>6.11 Fully implement the All-Wales branding / messaging for Speaking Up Safely (once developed).</p>	<p>Not applicable.</p>	<p><b>17</b> News article to be published and promoted through the staff intranet page following the Board meeting in November.</p>	Director of People and Organisational Development	30 Nov2023
		<p><b>18</b> Promote through various staff engagement methods:</p> <ul style="list-style-type: none"> <li>• Staff news</li> <li>• Manager news</li> <li>• Yammer/ Viva Insights</li> <li>• Learning and development activity</li> <li>• Link to Skills Boosters</li> </ul>	Director of People and Organisational Development	31 Dec 2023
		<p><b>19</b> Board Secretary to attend each of the staff networks and TU forums and to promote the Framework.</p>	Board Secretary and Head of Board Business Unit	31 Mar 2024
<p>6.12 Continuously / consistently promote and raise awareness of speaking up and listening / responding as a pro-social / desirable behaviour.</p>	<p>The Board Chair references and promotes the Raising Concerns process at each Board meeting, which is live streamed to the public.</p> <p><b>Culture Assessment:</b> We have recently invited all colleagues to take part in a cultural assessment, measuring both our current organisational culture and our ideal culture.</p> <p>Colleagues have told us that our ideal culture, and the behaviours that should be expected of us all, is one in which we value our relationships, are expected to work together co-operatively and to support and show compassion towards one another.</p> <p>This constructive culture provides the conditions in which colleagues can feel safe and able to speak up, and to be listened to and taken seriously, as within this culture, we are expected to:</p>	<p><b>20</b> Full implementation of the findings of the <b>Culture Assessment:</b></p> <p>We are currently identifying gaps between our current and ideal culture and working with colleagues across the organisation, inviting reflections and ideas on how we can close those gaps as part of our Culture Change programme.</p> <p>Work in partnership with key stakeholders and enablers and utilise diverse data sources to determine the factors influencing our organisational culture and engagement. Regular updates on progress towards this will be provided to the People and Organisational Development Committee</p> <p>Collaborate with key stakeholders to deliver the established roadmap for the integration of our cultural narrative and People Promise (employee value proposition).</p>	Director of People and Organisational Development	30 Sept 2024

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	<ul style="list-style-type: none"> <li>• Be good and active listeners, encouraging each other to have open conversations, contribute our thoughts, suggest where things can be better and bring concerns and issues into the open;</li> <li>• Behave in a constructive and supportive way, so that when concerns are raised, we see this as an opportunity to listen, grow, learn and improve and to respond positively to those concerns - and under no circumstances to penalise those raising them;</li> <li>• Resolve conflicts constructively, having better conversations, within an environment of Psychological Safety, where colleagues feel able to challenge the behaviour of colleagues and managers, with the aim of securing constructive and lasting solutions;</li> <li>• Ensure there is next to no use of positional power which may inhibit colleagues from feeling able to speak up safely;</li> <li>• Trust each other – which includes mutual trust between anyone raising a concern and the person listening.</li> </ul> <p>Underpinning our culture work, our <b>Being Our Best behavioural framework</b> brings our values to life, describing how working together, with trust and respect, to make a difference should show up in our everyday experiences. It sets out how we are all expected to behave, including expectations that:</p> <ul style="list-style-type: none"> <li>• Our managers create the climate in their teams in which people can speak up and challenge them and others - by welcoming all views, being open about errors and actively listening to the team;</li> <li>• Our organisational leaders visibly demonstrate that they trust people's intentions and support everyone to speak up when needed.</li> </ul> <p>Based on our organisational values, it describes observable ways of working, from demonstrations of understanding, to actions that we collectively commit to. It gives us all a common language to work with and a tool by which we can support our development, our growth, our personal effectiveness and hold ourselves to account for our part in having a more positive employee experience. It's a values-based commitment to each other – the handshake agreeing to be our best and help others to do the same.</p> <p>As part of this framework, there is a suite of tools to support colleagues in starting to understand how they see themselves,</p>	<p>Ongoing monitoring of progress will be overseen by the People and Organisational Development Committee, with a milestone for review set for April 2024 meeting.</p>		
		<p><b>21</b> Implementation of the Being Our Best Framework:</p> <p>The next step will be the embedding <b>Being Our Best</b> into everything we do, so that the behaviours describing us when we're at our best will be core to our organisation's DNA.</p> <p>This year, colleagues will use the framework within My Contribution meetings to talk about strengths and development areas, and when planning objectives, describe the 'how' as well as the 'what' and an interactive toolkit has been developed to support colleagues with this.</p>	<p>Director of People and Organisational Development</p>	<p>30 Sept 2024</p>
		<p><b>22</b> Reference the communication plan within the process within the Speaking Up Safely Assurance Protocol.</p> <p>This should include:</p> <ul style="list-style-type: none"> <li>• Proactive comms following Board meeting in November, then Bi-annually following.</li> </ul>	<p>Board Secretary and Head of Board Business Unit</p>	<p>30 Nov 2023</p>
		<p><b>23</b> News article to be published and promoted through the staff intranet page following the Board meeting in November and the adoptions of the Framework and the updated procedure.</p> <p>This article will highlight the material / resources available and encourage all managers to discuss the process for raising concerns within My Contribution discussions. We will also amend the My Contribution template to include reference to Speaking Up Safely to encourage managers to have that discussion as part of the regular My Contribution review cycle.</p>	<p>Director of People and Organisational Development / Board Secretary and Head of Board Business Unit</p>	<p>30 Nov 2023</p>

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	and perhaps the experience they offer colleagues, including self-assessment tools/ reflection guides.			
6.13 Ensure that appropriate training to deliver a Speaking Up Safely culture is rolled out to leaders, managers and staff throughout the organisation, as part of leadership and management development arrangements	We have introduced an accredited programme to develop Culture Advocates who will be able to confidently and effectively support their teams and the wider organisation during our culture change programme.	<b>24</b> <ul style="list-style-type: none"> <li>• Develop a training plan for Organisational Leaders, People Managers and all Colleagues.</li> <li>• Provide bias and cultural awareness training and/or supervision for those who will hear the concerns staff members raise (link to Skills Boosters).</li> <li>• Co-produce communication and engagement plan with Trade Union partners, staff diversity networks, those with lived experience, etc?</li> <li>• What do staff and TUs think are the organisational barriers and enablers to Speaking up Safely? How can we reduce and remove barriers?</li> <li>• There is an opportunity to roll out the Culture Advocates to further cohorts within the organisation, subject to additional funding.</li> <li>• Recognising that leaders need to be role models and set the standard, we are supporting and developing leaders and managers in their personal skills, qualities, style, and approaches. This includes new Leading with Impact workshops, for all our people managers, which will include developing core skills to create greater empowerment and Psychological Safety, ensuring that leaders are listening actively and open to constructive challenge, and that they can have difficult conversations with their people.</li> </ul>	Director of People and Organisational Development	31 Dec 2023