



Florence

Raising Concerns/Whistleblowing Policy and Procedures (Northern Ireland)

Policy Lead	Mayvelyn Talag Registered Manager NI
Authors	Florence Governance Team
Ratified	Florence Leadership Team 19th January 2024
Policy Number	RNII7
Version Number	1.0
Date of issue	30th January 2024
Date to be reviewed	30th January 2027
The controlled version of this document is stored on the Policy Portal on Notion. Not controlled once printed	

Table of Contents

1. Introduction	2
2. Policy Statement	2
3. Scope	2
4. Definitions, Roles and Responsibilities	3
5. Procedures	3
6. Speaking up	4
7. Concerns about Care Delivery	4
8. Anonymous reporting	5
9. Freedom to Speak Up Officer (FSO)	5
10. Disclosing concerns externally	5
11. Next Steps	5
12. Support	6
13. Misuse of this policy	6
14. Monitoring and Compliance	6
15. Policy Changes/Version History	7
16. Appendix 1 - Policy Summary	8
Things you should know:	8
Things you should do:	8



1. Introduction

Florence recognises that raising concerns about wrongdoings can be one of the most difficult and challenging things to do in a work environment.

Whistleblowing is the term used when an employee reports something that they see or have found out about that they consider to be wrong and they report it. This covers everything from raising a concern with a manager (internal) to raising concerns with regulators and the police (external).

In most cases, employee's with concerns should report to their line manager, using the Complaints Policy and Procedures. If they cannot or do not wish to do this for any reason, then they should follow the procedure set out below and will not be disadvantaged for raising what they consider to be a legitimate concern.

2. Policy Statement

Florence is committed to ensuring an open culture with the highest standards of honesty and accountability. This policy is designed to allow Florence employees to disclose information that they believe constitutes wrongdoing, without being penalised in any way for doing so.

All concerns will be treated seriously and investigated promptly. This policy should be read in conjunction with the Incident Management Policy.

Florence will ensure that all lessons learned from feedback are used as a means of improving the quality and services provided.

Florence recognises its legal responsibility to respond appropriately and effectively to complaints.

3. Scope

This policy and the procedures apply to care professionals using Florence App as well as all internal employees in the Florence Central Team.



4. Definitions, Roles and Responsibilities

CEO (Chief Executive Officer) The CEO is ultimately responsible for the overall management and direction of the company. The CEO has the ultimate responsibility for setting the tone and culture for the organisation, ensuring that all employees understand the policy's importance, and overseeing its implementation.

Central Team - All direct employees of Florence that are not care professionals working through the Florence platform

Service User - a person who uses health and/or social care services. Sometimes known as a "patient", "client" or "person in care".

Care Professionals - Anyone on the Florence platform that carries out work on behalf of Florence in other organisations, for example registered nurses and care assistants.

Employees - everyone employed by Florence directly and indirectly, including care professionals using the platform and the central team.

Regulation and Quality Improvement Authority (RQIA) - is the independent body responsible for monitoring and inspecting the availability and quality of health and social care services in Northern Ireland, and encouraging improvements in the quality of those services.

Registered Manager is responsible for ensuring that this policy meets the needs of regulators in Northern Ireland.

5. Procedures

All concerns should be raised in circumstances where an employee genuinely believes that their manager or any of their colleagues have taken or are intending to take or have failed to take action that they reasonably believe could lead or amount to:

- a failure to comply with any legal obligations
- a criminal offence that has been, is being or is likely to be committed
- unauthorised or inappropriate disclosure, misuse or loss of confidential, personal and/or sensitive information
- a miscarriage of justice
- bribery or financial fraud
- risk or damage to the environment



- a danger to the health and safety of employees or others
- attempts to suppress or hide information or evidence relating to wrongdoing in any of the areas above.

The Public Interest Disclosure Act 1998 provides protection for employees who reasonably believe that they are acting in the public interest, where the concern (disclosure) is covered under one of the areas above. The concern can be about an incident that happened in the recent past, is happening now or that they believe is likely to happen in the near future.

Concerns over personal issues such as a complaint about a colleague's conduct, manner or behaviour should be raised using the appropriate company procedure, likely to be either the Grievance or the Bullying and Harassment Policy and Procedures.

6. Speaking up

If possible, employees should raise their concerns internally and to their line manager. They can also be reported verbally or in writing to any Florence Leadership team or director within the Company, if the employee feels unable to discuss the concern with their line manager. We encourage employees to provide as much detail as possible, including anything they have witnessed, any evidence that they have obtained and the dates and times of incidents occurring, as appropriate.

7. Concerns about Care Delivery

Florence encourages individuals to raise any issues about care delivery with the Head of Nursing and Governance at the first stage to enable concerns to be resolved collaboratively with the senior team for the organisation and enable them to address the concerns raised. In circumstances where concerns are raised around the delivery of care, which is external to those services provided by Florence, these concerns will be reported to the appropriate authority including those as defined above for onward investigation.



8. Anonymous reporting

Employees may make a protected disclosure, through Florence's Freedom to Speak Up Officer (FSO) confidentiality will be ensured (unless we are required to disclose the whistleblower's identity by law). Fully anonymous reporting is discouraged as it may prevent Florence obtaining further information in relation to the concern raised and prevent a full investigation from taking place.

9. Freedom to Speak Up Officer (FSO)

For employees and care professionals, the FSO is Head of People Operations.

The FSO will treat any concerns as confidential, if requested, however it may not be possible to provide complete anonymity, depending on the issue.

To contact the FSO, email incidents@florence.co.uk or people@florence.co.uk. putting FSO in the subject line.

10. Disclosing concerns externally

If the care professional feels that they are unable to raise their concern internally they may make a disclosure to a relevant regulatory authority, or if a criminal matter, the police.

In Northern Ireland, the RQIA can be contacted through the RQIA Guidance Team: 028 9536 1990 or by email info@rqia.org.uk

11. Next Steps

Concerns will be listened to by the senior manager and they will consider what, or if, further action is needed. The whistleblower will be informed who else may need to be spoken to. All concerns escalated to the FSO will be passed on to the Governance Lead and in turn, the Head of Nursing and Governance. In regulated services, the Registered Manager will need to be informed and they will consider any actions to be taken.

The matter will be fully investigated with the whistleblower, and with other people that they believe are involved with or connected to the suspected wrongdoing, by an appointed independent investigating officer who may be internal or external to Florence. Where possible, the whistleblower will be kept informed about the actions which are proposed or are being taken.



This may not always be possible as Florence is under a duty to protect the confidentiality of any other people that are involved. If a whistleblower does not feel that their concern has been dealt with appropriately or if they disagree with the outcome, they may escalate to the Head of People Operations, the Quality Governance Director and/or the CEO.

12.Support

It is understandable that staff may feel that they will be 'singled out' for making a disclosure that they believe to be in public interest. Florence will take every step to ensure that if employees raise a legitimate concern they will be protected and supported.

For confidential support and advice at any stage of a concern raised, the independent charity Public Concern at Work can be contacted on 0207 404 6609 or by e-mail on: whistle@pcaw.org.uk or the NHS and Social Care Whistleblowing Helpline on 08000 724725 or by email on: enquiries@wbhelpline.org.uk.

The Royal College of Nursing and other Trade Unions can be contacted via their usual communication channels.

13.Misuse of this policy

Florence may take appropriate action against any person found to be:

- victimising another person for using this procedure
- deterring any person from reporting genuine concerns under this procedure.

If Florence finds that an employee has done either of the above, they may take disciplinary action against them, which may result in their dismissal.

14.Monitoring and Compliance

The policy will be reviewed every 3 years by the Governance Team, or earlier if there are any changes in the legislation, registration requirements or Company policy.



The Governance Lead and Head of Nursing and Governance will routinely review concerns raised, lessons learned and actions taken to ensure adherence to this policy.

15. Policy Changes/Version History

Date	Reviewed changes
02/09/24	Registered manager name change



16. Appendix 1 - Policy Summary

Things you should know:

1. Whistleblowing is the term used when an employee reports something that they see or have found out about that they consider to be wrong and they report it.
2. Florence recognises that there will be occasions when employees may feel concerned about wrongdoings and that raising concerns can be one of the most challenging things to do.
3. All genuine concerns will be listened to and acted upon, where necessary.
4. Florence has a Freedom to Speak Up Officer (FSO) who will treat any concerns as confidential, if requested, however it may not be possible to provide complete anonymity.
5. All concerns will be logged on the Incident Management System and monitored for themes and trends

Things you should do:

1. Anyone that has concerns about the standard of care delivery within a care setting should make their concerns known
2. Speak to your account manager about any concerns that you may have or if that is not possible, contact Florence's FSO.
3. Contact the Freedom to Speak Up Officer (FSO) confidentially by emailing incidents@florence.co.uk
4. If you feel unable to raise your concern to Florence, you may make a disclosure to a relevant regulatory authority, or if a criminal matter, the police.
5. For confidential support and advice at any stage of a concern raised, the independent charity Public Concern at Work can be contacted on 0207 404 6609 or by e-mail on: whistle@pcaw.org.uk or the NHS and Social Care Whistleblowing Helpline on 08000 724725 or by email on: enquiries@wbhelpline.org.uk. The Royal College of Nursing and other Trade Unions can be contacted via their usual communication channels.

