



FTSU assessment for Sandwell & West Birmingham NHS Trust

Date: 7th September 2020

Rachel Clarke, Advocacy and Learning Senior Manager (FTSU)

Advocacy and Learning (FTSU) Team

Staff Experience and Engagement, People Directorate

NHS England and NHS Improvement



Objective

As a result of concerns relating to the speak up culture, the Executive Lead, Kathy French, and Non Executive Lead for FTSU, Lesley Writtle, invited us to review the trust's FTSU arrangements and to recommend action they could take in order to bring them in line with the various national requirements.

National requirements around FTSU



NHSI National Whistleblowing policy template 2016 (NP)

NHSI/NGO FTSU Guidance for boards 2019 (BG)

NHSI/NGO FTSU Supplementary Information (BG/SI)

KLOE 3 of the Well Led Framework 2017 (WLF)

10 recommendations in the NGO Annual Guardian Survey 2017 (GS17)

12 recommendations in the NGO Annual Guardian Survey 2018 (GS18)

20 recommendations in the NGO Annual Guardian Survey 2019 (GS19)

Rating definitions

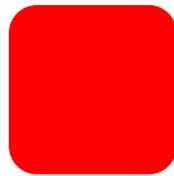
The ratings indicate our view of how far away from the national requirement the trust is.



Meets the national requirement. We may still suggest ways you could expand on what you are already doing



Partially meets the national requirement. We will recommend ways to develop what you have started.



Doesn't meet the national requirement. We will set out what you need to do to meet the requirement.

Methodology

Documents reviewed	Discussions with
<p>Whistleblowing Policy</p> <p>Public Board papers – Guardian and Exec Lead</p> <p>FTSU board assessment and action plan</p> <p>FTSU strategy</p> <p>NGO data</p> <p>NHS staff survey results</p> <p>CQC inspection report and evidence bundle</p> <p>Well led review</p> <p>FTSU audit report</p> <p>Recent ETJs – upheld claims of detriment – data requested from legal services (2018 to date)</p> <p>FTSU pulse surveys</p> <p>Guardian user feedback</p> <p>Comms and engagement plan</p> <p>NGO gap analysis</p> <p>Triangulated data analysis</p> <p>Guardian JD</p> <p>People Plan/Cultural development strategy</p>	<p>Guardians</p> <p>Champions</p> <p>Executive Lead</p> <p>NED Lead</p> <p>Governors</p> <p>CEO</p> <p>Chair</p> <p>NHSI Improvement Director</p> <p>Any external culture consultants</p> <p>Staff who have spoken up</p> <p>Focus groups</p> <p>Additional:</p> <p>Network chairs</p> <ul style="list-style-type: none"> • LGBTQ+ • Disability and Long Term Conditions (current and previous) <p>Chaplaincy Lead</p> <p>Trust Convenor</p>

Summary of the areas for development

	Recommendation	Priority	Page reference
1			
2			
3			
4			
5			
6			
7			
8			

Board commitment to FTSU – named executive and non-executive leads	BG, GS17, GS18	Rating
<ul style="list-style-type: none"> <input type="checkbox"/> Regular contact with Guardian <input type="checkbox"/> Exec Lead – led the development of the strategy <input type="checkbox"/> Exec Lead - Separate report to board <input type="checkbox"/> NED Lead – evidence of challenge at board 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • The Trust has six named Speak Up Guardians; these roles are held in addition to their substantive posts. • The Executive lead for the Trust has historically been the Executive Director of Governance. • This Director of Governance has presented the freedom to speak up information to Board since 2018; 2018 feedback was through a qualitative report, which transferred to a quantitative scorecard from 2019 – to date. • A whistleblowing policy is available for all staff on the internal Connect site, however this has a review date of 2017. • The NED lead for speaking up has recently changed; good levels of visibility, contact and support has been reported. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • The Guardians have access to the NGO generic Guardian JD and work to the principles within this, however they have not been issued with an organisational JD. This has, at times, raised some ambiguity around role and the interface with HR processes and also dedicated time to undertake the role. • The report that goes to Board is presented by the Director of Governance. This incorporates a scorecard which identifies the total number of speak up cases, in combination with other metrics such as: incidents reported, weConnect score, sickness absence %, star of the week nominations. The report does not include a qualitative element and no themes or trends are reported in writing to Board. • The Board papers are presented to Board by the Executive lead; the Guardians do not attend. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • Introduction of a job description alongside growth and continued development of the Speak Up team. • Introduction of regular meetings, which capture wider streams for speaking up, such as the Trust networks, chaplaincy and staff side representative. • Development of a mixed methodology/multi methodology approach to reporting Freedom to Speak Up themes, trends, outcomes, learning, pulse checks and psychological safety. 	

Board commitment to FTSU – speaking up and other cultural uses are included in the board development programme	BG	Rating
<ul style="list-style-type: none"> <input type="checkbox"/> Adhoc <input type="checkbox"/> Planned and repeated <input type="checkbox"/> NGO training done or scheduled in 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • A Freedom to Speak Up scorecard is presented to Board for discussion approximately twice per annum, based on 2018-2020 evidence. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • The Freedom to Speak Up scorecard provides quantitative metrics, albeit only one metric on the scorecard is directly related to speaking up. The other metrics are intended to be a 'heat map' of culture, for example weConnect survey scores, star of the week nominations, incidents reported, sickness absence. The scorecard has a place in terms of providing a degree of quantitative assurance, however the metrics should be collectively agreed to reflect the expectations from NHSEI and the NGO. • The scorecard needs to be supported by qualitative data to enable the Board to debate and discuss the appetite and psychological safety of speaking up within the organisation. • No evidence can be obtained to indicate that there has been a Board development session on freedom to speak up. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • Freedom to Speak Up shared learning topic in October's QIHD to coincide with October speak up month. • Board Development session on speaking up. • Introduction of qualitative data in relation to speaking up. • Guardians to attend Board to present their data. 	

Board commitment to FTSU – they welcome workers to speak about their experiences in person at board meetings		BG	Rating
<input type="checkbox"/> Each meeting <input type="checkbox"/> Alternate patient and staff story <input type="checkbox"/> Annually			
How the trust meets the requirement	<ul style="list-style-type: none"> • There is no evidence that either the Guardians attend Board or that staff who have spoken up are invited to talk and reflect on their experiences. 		
Areas of improvement needed	<ul style="list-style-type: none"> • Invite Guardians to Board to present their data and share experiences. • Invite staff who have spoken up to attend Board to share their experiences. • Ensure Guardians are not disadvantaged or suffer detriment as a result of escalating concerns raised to them. 		
Further development opportunities	<ul style="list-style-type: none"> • Pulse surveys to test organisational appetite to speaking up. 		

Board commitment to FTSU –Plan to monitor detriment and a process to review allegations	BG, GS19	Rating
<ul style="list-style-type: none"> <input type="checkbox"/> Discussion with Execs of NGO data on detriment <input type="checkbox"/> Discussion at board of NGO data <input type="checkbox"/> Can evidence that detriment claims have been acted on (in formal investigations) <input type="checkbox"/> Plans in place to monitor it in those that have spoken up <input type="checkbox"/> Independent process to review claims – NED involvement? <input type="checkbox"/> Understanding of what it looks and feels like? <input type="checkbox"/> Proactive work to prevent it happening 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • There is no evidence to confirm that Board and sub board level discussions take place to discuss detriment. • The Trust has recently identified a new NED to support speak up processes within the Trust. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • Clarity of role of the Guardian and how this links with current HR policy and processes. • Develop a strategy for speaking up with the inclusion of all stakeholders. • Review HR processes in line with the Speak Up strategy. • Link with legal services in relation to employment tribunals, outcomes and themes. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • Include qualitative data, feedback and reflection on speaking up through to Board which includes detriment. 	

Board commitment to FTSU – Role modelling behaviour	BG, WLF	Rating
<p>Individual executive and non-executive directors can evidence that they behave in a way that encourages workers to speak up. Evidence should demonstrate that they:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Understand the impact their behaviour can have on a trust’s culture and know what behaviours encourage and inhibit workers from speaking up <input type="checkbox"/> Test their beliefs about their behaviours using a wide range of feedback, reflect on it and make changes <input type="checkbox"/> Constructively and compassionately challenge each other when appropriate behaviour is not displayed <input type="checkbox"/> CEO discusses FTSU behaviours in appraisals 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • Development and roll out of a Managers Code of Conduct, which was produced as a result of speak up concerns. • Speak up days embedded as part of the corporate calendar. • Speak Up stand at the annual Leadership day, including support by Executive and senior leadership. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • Freedom to Speak Up Guardians to capture and record when they are approached by colleagues who have raised concerns but decide not to take their concern further, i.e. through an articulated fear of reprisal. • Anonymously test the appetite for speaking up and psychological safety. • Leaders at every level to consistently role model the behaviours expected from the Managers Code of Conduct. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • The Trust can evidence learning and changes as a result of speaking up. 	

Board commitment to FTSU – training	BG, WLF, GS17, NGO training resource, GS19	Rating
<ul style="list-style-type: none"> <input type="checkbox"/> FTSU included in induction <input type="checkbox"/> NGO training implemented, with a focus on middle managers <input type="checkbox"/> Can evidence FTSU element in leadership and performance management training <input type="checkbox"/> FTSU training is provided by a range of people, not just the FTSU Guardian 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • No evidence found of these actions being embedded in the Trust. • All Guardians have completed NGO training and have links with other regional teams. • Managers code of conduct developed as a result of speak up concerns. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • Freedom to Speak Up training for all levels across the organisation. • Speaking up to be included consistently as part of appraisal processes. • Review, evaluate and relaunch of the Managers Code of Conduct. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • Speak up to be included as part of induction. • Speak up to be included as part of role essential training. 	

Board commitment to FTSU – sustained, creative and engaging communication strategy	BG, BG/SI – section 3, WLF, GS17	Rating
<ul style="list-style-type: none"> <input type="checkbox"/> Multiple communication channels <input type="checkbox"/> Evaluation of impact <input type="checkbox"/> Covers raising awareness of FTSU and changes that have occurred <input type="checkbox"/> Some Exec led comms <input type="checkbox"/> Real life experiences of speaking up? <input type="checkbox"/> Has a stand alone comms and eng plan 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • Speak up days integrated into the corporate calendar. • Interview with the NED for speaking up to be included in Heart Beat (Sept 2020). 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • Align the speak up days with the national speak up month. • Development of a speak up strategy and approach for raising concerns that provides psychological safety and ensures confidentiality. • Include the Guardians in the communications planning. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • Development of a connect (intranet) page for speaking up. • Trust wide visibility of who the Freedom to Speak Up Guardians are and how to make contact. • Engagement with wider sources for speaking up, for example: networks – BAME,LGBTQ+, disability and long term conditions; Inclusion leads; Women in medicine/leadership groups; chaplaincy. • Review speaking up questions within weConnect surveys. 	

Strategy	BG/SI – section 4	Rating
<p>Comprehensive and up to date strategy to improve its FTSU culture</p> <ul style="list-style-type: none"> <input type="checkbox"/> SMART <input type="checkbox"/> Discussed and agreed by board <input type="checkbox"/> Staff involvement in design <input type="checkbox"/> Linked to or embedded within other relevant strategies – B&H, patient safety, just culture <input type="checkbox"/> Board regularly updated by executive lead on the progress against the strategy as a whole <input type="checkbox"/> Executive lead oversees the regular evaluation of what the strategy has achieved using a range of measures <input type="checkbox"/> FTSU Steering group in place to shape and monitor progress delivering the strategy 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • Unable to identify a Trust strategy in relation to speaking up. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • Development of a Trust wide strategy following an open and transparent consultation. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • Extensive communications plan to support the consultation, development and launch. • Develop a clear plan for evaluating the strategy. 	

Guardian recruitment	GS17, GS18, GS19	Rating
<input type="checkbox"/> The board can evidence that the FTSU Guardian role was implemented using a fair recruitment process (open competition) in accordance with the example job description and other guidance issued by the NGO		
How the trust meets the requirement	<ul style="list-style-type: none"> • No evidence of the recruitment process could be identified. • Anecdotal feedback that appointment was via expression of interest and follow up conversation. 	
Areas of improvement needed	<ul style="list-style-type: none"> • Ensure all Guardians have a job description. • Grow the total number of Guardians and Champions within the Trust. • Develop and open and transparent recruitment process. • Understanding why colleagues that remain within the Trust relinquished the Guardian role, using feedback to develop the Guardian role and learn from previous experience. 	
Further development opportunities	<ul style="list-style-type: none"> • Review model for speaking up to ensure that there is scope to effectively coordinate all speak up activities within the Trust. 	

Exec support for Guardian – ring fenced time to do the job	BG/SI – section 2, GS17, GS18, GS19	Rating
<input type="checkbox"/> Ring fenced time allowance for the Guardian/champions <input type="checkbox"/> Regular evaluation of whether there is enough time		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> The Trust does not provide ring fenced time for the Guardians to undertake the role. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> Agree a model for speak up Guardians and Champions with the Trust. Ensure ring fenced / protected time to undertake the role is offered to all Guardians. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> Consider a model whereupon there is dedicated resource to coordinate speak up activities, data collection, uploads, reporting, training and education. 	

Exec support for Guardian –support to do the job	BG, GS17, GS18, GS19	Rating
<ul style="list-style-type: none"> <input type="checkbox"/> Regular meetings between Guardian and key execs as well as non-executive lead <input type="checkbox"/> Enabled the Guardian to escalate patient safety matters and help progress speaking up cases <input type="checkbox"/> Enabled access to anonymised patient safety and employee relations data for triangulation purposes <input type="checkbox"/> Enabled to develop external relationships, attend NGO related events and regional meetings <input type="checkbox"/> Provision of emotional support <input type="checkbox"/> Own budget 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • Previously the Guardians had meetings whereby the last 30 mins would be attended by an Executive; CEO, Director of Governance, Director of Comms, Director of People and OD. These had ceased but are recommencing from October 2020 with support from Deputy Director of Governance, Director of Comms and Non Exec Director for Speaking Up. • Guardians have links with regional teams. • No pastoral care provided to the Guardian team. • There is no evidence of a FTSU budget or access to resources required for the role. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • HRD to be invited once interim identified and commencement date confirmed. • Dedicated pastoral support and supervision to be identified; we have an option to explore some elements through the Trust wellbeing hub. • Allocation of budget and support. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • Evaluation of reconvened meetings to ensure that they are fit for purpose, i.e. meet the needs of the Guardians and are in line with NGO expectations. • Central coordination of Guardian functions. 	

Guardian –activity	GS17, GS18, GS19	Rating
<ul style="list-style-type: none"> <input type="checkbox"/> Train champions (NGO GUIDANCE DUE) <input type="checkbox"/> Assess which groups of staff face particular barriers and take action to tackle <input type="checkbox"/> Obtain and evaluate feedback <input type="checkbox"/> Undertake refresher training provided by the NGO or guardians trained by the NGO every 12 months <input type="checkbox"/> Assess their training needs every 18 months using the NGO’s Education and Training Guide and trusts support them by providing the resources to enable them to continually develop their skills, knowledge and abilities <input type="checkbox"/> Guardians/champions assess the possible conflicts that any other role may bring and mitigate them (NGO GUIDANCE DUE) 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • No evidence that anonymised data is shared in terms of barriers, specific groups of staff etc. • No evidence of training plan for Guardians or other members of staff to whom concerns may be raised, i.e. chaplaincy, network chairs. • No protected/ring fenced time to allow Guardians to attend role specific training. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • Identification of speak up training budget. • Protected/ring fenced time to allow Guardians and champions to attend training. • Dissemination of local training to develop a cohort of champions. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • Development of an annual training needs analysis for the Guardians and champions. • Development of leaders at all levels in relation to Speak Up, subsequently linking in to future Board Development sessions: united messaging. 	

Guardian –board attendance	BG, BG/SI – section 7, WLF, GS17, GS18, GS19	Rating
<ul style="list-style-type: none"> <input type="checkbox"/> The board can evidence that the Guardian attends board meeting, at least every 6 months. <input type="checkbox"/> The Guardian report is comprehensive and follows the NHSI guidelines. 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • No evidence could be found to indicate that Guardians attend Board meetings. • The Guardians confirmed that they do not attend Board meetings. • The Guardians confirmed that information was shared with the Director of Governance and CEO, but could not confirm where this information went / was shared further. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • Guardians to attend Board bi-annually to share information, themes, trends and experiences. • Guardian report to be developed to comprehensively include NHSI and NGO recommendations. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • Guardians not to feel detriment as a result of their role and raising concerns. • Colleagues to share their experiences of speaking up to the Board. 	

Board assurance – policy reflects the minimum standards set out by NHSI	NP, BG, WLF	Rating
<ul style="list-style-type: none"> <input type="checkbox"/> The policy is up to date and has been reviewed every 2 years <input type="checkbox"/> Reviews are informed by feedback from workers, audits, and gap analysis against NGO case review findings <input type="checkbox"/> Any amendments are in the spirit of the national policy – ie no PIDA, no threats, anonymous is okay, all concerns welcome 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • A Whistleblowing policy is available on Connect (intranet) for all staff to access. • The Whistleblowing policy was due to be reviewed 2017. • A Freedom to Speak Up (Whistleblowing) Policy was presented at Board during 2018 and 2019 in varying formats; however there is no evidence of policy consultation, or whether the Freedom to Speak Up was ratified and signed off, and if so at which committee. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • Development of a Freedom to Speak Up policy, which reflects NHSI guidance and recommendations and includes extensive consultation. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • The policy reflects learning from speaking up from within the organisation. 	

Board assurance – how the board are assured the speaking up culture is healthy and effective	BG, WLF	Rating
<ul style="list-style-type: none"> <input type="checkbox"/> The Exec Lead produces a report in addition to the Guardian report. <input type="checkbox"/> Contains analysis of all speaking up channels triangulated with other relevant patient safety and worker experience data – clearly identifying emerging issues/hot spots <input type="checkbox"/> Review of strategy <input type="checkbox"/> Contains discussions, when relevant, of whether to increase Guardian resource in the light of extra ordinary events 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • The Exec Lead, Director of Governance, had produced a scorecard for Freedom to Speak Up which was reported to Board, on average, bi-annually since 2019. The scorecard provides quantitative data only. The quantitative data does not reflect all the key measures identified by NHSI and NGO. • There is no evidence of triangulation of data being presented in written format. • The public Board meeting minutes do not reflect that a conversation or discussion has taken place in relation to triangulation of data. • The Trust does not have a Freedom to Speak Up strategy, therefore no review has taken place. • There is no evidence of a discussion regarding Guardian resource; the total number of Guardians has decreased from 10 to 6 from 2018 to 2020. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • The Board receives a mixed methodology report, sharing both quantitative and qualitative data, allowing triangulation of data to happen in a more transparent manner, and with presentation from the Guardian biannually as a minimum. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • The Board receives assurance that the triangulation of data is acted upon and ‘hot spots’ are supported in line with the Trust speaking up strategy. 	

Board assurance – do staff feel safe and confident to raise concerns		BG, WLF	Rating
<input type="checkbox"/> How do board know this?			
How the trust meets the requirement	<ul style="list-style-type: none"> • There is no evidence that this information or feedback has been shared with Board. • The Guardians have no clear reporting process for capturing staff who raise concerns with them but then decide not to pursue due to reasons such as fear of reprisal. • The Trust participate in the national staff audit. • The Trust participate in local weConnect surveys, with data feeding up through the Clinical Leadership Executive and up to Board through inclusion in the Speak Up score care. The data shared up to Board is quantitative data. 		
Areas of improvement needed	<ul style="list-style-type: none"> • Introduce anonymised pulse surveys with two key questions around: 1. do they feel safe to speak up, and 2. what would make them feel safe to speak up. • Include reflections of the Guardian role and anonymised feedback from raising concerns in the Board papers and presented by the Guardians. 		
Further development opportunities	<ul style="list-style-type: none"> • Trust wide cultural development and supporting strategy. 		

Board assurance – the trust is learning from others	BG, GS19	Rating
<ul style="list-style-type: none"> <input type="checkbox"/> The board can evidence that they receive thorough gap analysis in relation to guidance and reports from the National Guardian that clearly sets out how the trust performs in relation to the recommendations and what work they need to do to bridge the gap. <input type="checkbox"/> Guardian is an active part of their regional network <input type="checkbox"/> Where appropriate the Guardian is supporting other trusts to develop their FTSU processes 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • No evidence of this a gap analysis could be located. • The Guardians have links with local networks, but shared learning from others is not shared with Board. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • The Guardians are involved and influence Trust wide work on speaking up culture and strategy. • Complete a gap analysis against annual NGO recommendations and case studies, implementing actions and reporting to Board. • Development of a FTSU steering group. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • Guardians to host regional speak up meetings and events. 	

Board assurance – lessons learnt and acted on	BG, WLF	Rating
<ul style="list-style-type: none"> <input type="checkbox"/> Improvement action is being monitored and measured <input type="checkbox"/> Lessons are shared: forums, committees, publications, cascades <input type="checkbox"/> Lesson are acted on: personal reflection 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • No evidence could be identified that lessons learnt are identified and acted upon. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • Factor lessons learnt into the Guardian and Exec Lead Board reports. 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • Use the learning to develop training for the wider workforce around psychological safety and also leadership/ manager expectations. 	

Open and transparent externally	BG	Rating
<p>The trust can evidence how it has been open and transparent in relation to concerns raised by its workers. Evidence should demonstrate:</p> <ul style="list-style-type: none"> • Discussion with relevant oversight organisation • Discussion with relevant peer networks • Content in the annual report • Discussion at public board • Welcomes engagement with the National Guardian and her staff 		
<p>How the trust meets the requirement</p>	<ul style="list-style-type: none"> • There is no evidence of engagement with peer networks being escalated to Board either in writing or verbally documented in public board minutes. • There is no evidence of previous engagement with the NGO or NHSI in relation to speak up. • A section on speaking up was included in the Quality Accounts for 2018-19, pp..11-12. This provided an overview of how to speak up within the Trust. • Videos of the Guardians are available on the Trust website. 	
<p>Areas of improvement needed</p>	<ul style="list-style-type: none"> • Supporting the opportunity for discussion at public Board through the introduction of mixed methodology reporting and the attendance of Guardians. • Data around learning from speaking up to be included in future Quality Accounts. • Engagement with peer networks and other high performing Trusts, i.e. having a buddy trust. • Engagement with NHSI to developing our speak up culture 	
<p>Further development opportunities</p>	<ul style="list-style-type: none"> • Access to learning from speaking up on the Trust website and intranet pages. • Implement learning from others. • Regular evaluations of our speak up strategy. 	

Trust response to recommendations

	Recommendation	Accepted?
1		
2		
3		
4		
5		
6		
7		
8		