

Raising Concerns in the MBBS programme

What is a Raising Concern?

A raising concern is a formal expression of grievance or dissatisfaction by a student, relating to a problem encountered in the context of their medical degree. It is important that students know how to raise concerns if they see or experience something that disturbs them, including concerns regarding patient safety. This may be during pre-clinical taught modules or during clinical placements and typically relates to the behaviour of others: doctors; healthcare professionals; tutors; administrators or other students.

The role of the Quality Assurance and Enhancement Unit

The Quality Assurance and Enhancement Unit (QAEU) is responsible for ensuring high standards and good practice within the teaching, learning and assessment processes for the Medical School's (UCLMS) undergraduate programme. As such, the management of the raising concerns process¹ is within the QAEU's remit. The QAEU reports to the Academic Lead for Quality and, ultimately, to the Director of the Medical School, either/both of whom may become involved if a serious concern is raised.

BMA Charter for medical schools to prevent and address racial harassment²

The BMA Charter is a set of actions for medical schools to commit to undertake in order to prevent and effectively deal with racial harassment on campus and in work placements. As a signatory, UCLMS needs to demonstrate its compliance to the 4 sections of the Charter: supporting individuals to speak out; ensuring robust processes for reporting and handling complaints; mainstreaming equality, diversity and inclusion across the learning environment; and addressing racial harassment on work placements. The raising concerns process is a key element of this compliance.

Before reporting a concern

1. If a student sees something that causes them concern, or experiences inappropriate behaviour from another individual, they should initially discuss it with someone they trust. It can be difficult to decide how serious a concern is, particularly those relating to professional behaviour where opinions may differ, and students may not feel they have the experience to know what is acceptable or not. Discussing it with someone else can help them decide whether there really is a problem that should be reported.
2. Each of UCLMS' partner Trusts has a Freedom to Speak Up Guardian,³ who support Trust employees to speak up when they have a concern. They ensure that people who speak up are thanked, that the issues they raise are responded to and make sure that they receive feedback on any actions taken.

¹ <http://www.ucl.ac.uk/medical-school/quality/raising-student-concerns>

² <https://www.bma.org.uk/media/2030/bma-med-school-charter-implementation.pdf>

³ <https://www.nationalguardian.org.uk/freedom-to-speak-up-guardian-directory/>

3. The Trust-based Freedom to Speak Up Guardians are ideally placed to discuss concerns with UCLMS students and encourage them to report their concerns to the Medical School via the online raising concerns portal.
4. Two members of UCLMS staff will be trained as Freedom to Speak Up Guardians during the 2020-21 academic year and will join the existing network of Guardians in North London to share information and best practice. They will also be available to discuss issues with concerned students.

Reporting a concern

1. Once a student decides to report their concern, there are several ways to do it:
 - Through the online raising concerns reporting form⁴, which is the preferred mode of reporting as it allows students to provide all the required information about an incident.
 - Through a third party, who can submit a report on their behalf either using the online portal or by contacting the QAEU⁵ directly.
 - Emailing the QAEU or another member of UCLMS staff.
2. The majority of raising concerns reports are submitted via the online portal, which is checked at least once a day by a member of the QAEU.
3. Concerns that should be reported through the raising concerns portal are those that:
 - Relate to the safety of students, patients or staff or to a clear and serious breach of the legal, ethical and professional standards of behaviour by staff or students. For example, abuse or ill treatment of a patient, student or member of staff; criminal offences; discrimination or harassment of a patient or student; asking students to perform examinations or procedures on patients without their valid consent; asking students to undertake procedures they are not comfortable with; or dishonesty. Abuse of any nature, inclusive but not limited to verbal, psychological, physical and sexual abuse, will not be tolerated and will be treated as a serious breach of professional and ethical standards.
 - Relate to the behaviour of staff, students or patients, but are unlikely have an impact on the safety of others or constitute a gross breach of professional guidelines. For example, bullying, undermining or humiliating behaviour by a member of staff or a patient. The actions taken to address these concerns will vary according to their nature.
4. Concerns, for example, about poor quality teaching or learning materials, should be reported via the end of module/placement student evaluation questionnaires (SEQs) or via the online student voice platform, Unitu rather than via the raising concerns process. They are likely to be referred to the relevant module lead for resolution.

Anonymous reports and confidentiality

- In line with UCL's Public Interest Disclosure policy⁶, students are encouraged to include their name on the raising concerns report. Anonymous reports are much less powerful and far less capable of being addressed, although they may be considered at the QAEU's discretion depending upon the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the report from alternative, credible sources. Although it is unlikely that the QAEU can conduct a full investigation into an anonymous report, it will be kept on file and will be used to build a better picture of the scale and nature of issues that students are exposed to. Anonymous reports may also be used as additional evidence if a similar concern is raised in the future.

⁴ <https://ucl.onlinesurveys.ac.uk/raising-concerns>

⁵ medsch.qaeu@ucl.ac.uk

⁶ https://www.ucl.ac.uk/hr/docs/public_interest_disclosure.php

- Each raising concerns report is stored in a secure online file that can only be accessed by members of the QAEU.

What happens next?

- Once a raising concern report has been submitted, a member of the QAEU decides on the next step according to the nature and severity of the concern. Serious concerns are given high priority and, where patient or student safety is involved, the QAEU will contact the relevant clinical site as a matter of urgency to ensure that the source of the concern is immediately removed. Concerns relating to students are referred to UCLMS' Divisional Tutor and those involving GP practices are referred to the Director of Undergraduate Education for Primary Care for resolution.
- Reports relating to an individual, who has previously been subject to a raising concern, may be escalated and referred directly to the relevant undergraduate lead. Otherwise, the process is as below.
- A member of the QAEU (the clinical teaching fellow, Professor Ann Griffin, or the QA Manager) meets the student to discuss the concern further, identify any additional information, for example, whether other students witnessed the incident, and discuss the options for further action.
- If the student decides not to take the matter any further, the report is kept on file in case future concerns are raised about the relevant individual.
- If the student decides to take the matter further, there are 2 potential processes: UCL's Student Complaints Procedure⁷; or UCLMS' process. The majority of students opt for the latter, detailed below.

Resolution of the concern via UCLMS' process

- The QAEU expects concerns to be resolved within a month of a report being submitted, although this may be extended in exceptional circumstances.
- If the concern relates to a clinical placement, the QAEU sends the report, along with any additional information, to the undergraduate lead at the relevant Trust. In the instance of the site lead being the subject of the concern, the report is sent to the Director of UCLMS. For taught modules, the report is sent to the relevant module lead, unless they are the subject of the concern, in which instance it is referred to the year lead.
- The QAEU's preferred position is for the student to agree to their name being disclosed and this will be discussed at the meeting with them. However, the QAEU is within its rights to protect the student and not disclose their name if there is a potential for repercussions on them.
- The undergraduate lead is asked to discuss the concern with the relevant individual and provide them with any necessary support. The lead may delegate this responsibility to a third party provided the latter is confident to discuss the matter with the individual. Alternatively, the individual can request a meeting with the Academic Lead for Quality to discuss the concern and any potential resolutions.
- The individual is encouraged to reflect upon the concern and provide an appropriate response, which should include acknowledgement of the situation, an evaluation of why it occurred and any actions they will take to address the concern. Doctors who are subject to a raising concern should record details in their portfolios to be discussed as part of their future appraisals and their revalidation with the GMC⁸. If the individual feels that the student's report does not

⁷ <https://www.ucl.ac.uk/academic-manual/chapters/chapter-6-student-casework-framework/section-10-ucl-student-complaints-procedure>

⁸ https://www.gmc-uk.org/doctors/revalidation/revalidation_information.asp

accurately represent what happened, this should be discussed with the lead and fed back to the QAEU.

- The lead reports the outcome of the discussion back to the QAEU and, in the majority of instances, the concern is closed and the situation is monitored through future SEQs. If, however, the QAEU does not believe the outcome is sufficient, the concern is referred back to the lead for further consideration.
- Once a concern is closed, the QAEU provides the student with a summary of the outcome and actions taken.