

## CPSS Whistleblowing Policy On behalf of Surrey and Sussex LPC's

### Speak up – we will listen

Speaking up about any concern you have at CPSS and the two LPC's is really important. In fact, it is vital because it will help us to provide a high standard of support to our contractors and improve our services. You may feel worried about raising a concern, and we understand this. But please don't be put off. CPSS is fully committed to an open and honest culture. We will investigate what you say, and you will always have access to the support you need.

### This policy

This policy was a recommendation of the review by Sir Robert Francis into whistleblowing in the NHS, which identified awful experiences of people being met with obstruction, defensiveness and hostility when they tried to raise concerns at work. This policy has been adapted from the standard integrated policy produced by Monitor, the Trust Development Authority and NHS England for hospitals. This policy is being adopted by NHS primary care providers in England to help ensure a consistent approach to raising concerns.

Our local process within our complaints procedure [here](#) and staff handbook adheres to the principles of this policy and provides more detail about how we will look into a concern.

### What concerns can I raise?

You can raise a concern about **anything** you think is harming the service we deliver. Just a few examples of this might include (but are by no means restricted to):

- unsafe working conditions
- inadequate induction or training for staff
- a bullying culture

### *If in doubt, please raise it*

Don't wait for proof. We would like you to raise the matter while it is still a concern. It doesn't matter if you turn out to be mistaken as long as you are genuinely troubled. If your concern is a personal complaint about your own employment situation, rather than a concern about malpractice or wrongdoing that affects others, then you may wish to raise a grievance using our grievance policy within the staff handbook.

### Feel safe to raise your concern

If you raise a genuine concern under this policy, you will not be at risk of losing your position, job or suffering any form of reprisal as a result. We will not tolerate the harassment or victimisation of anyone raising a concern. Nor will we tolerate any attempt to bully you into not raising any such concern. Any such behaviour is a breach of our values at CPSS and, if upheld following investigation, could result in disciplinary action.

Provided you are acting in good faith (effectively this means honestly), it does not matter if you are mistaken or if there is an innocent explanation for your concerns. Of course, we do not extend this assurance to someone who may maliciously raise a matter they know is untrue.

### **Confidentiality**

We hope you will feel comfortable raising your concern openly, but we also appreciate that you may want to raise it confidentially. Therefore, we will keep your identity confidential, if that is what you want, unless required to disclose it by law. You can choose to raise your concern anonymously, but that may make it more difficult for us to investigate thoroughly and give you feedback on the outcome.

### **Who can raise concerns?**

Anyone who works within CPSS or the individual LPC's either as an employee or as a committee member, can raise concerns.

### **Who should I raise my concern with?**

In the first instance, as an employee you may feel comfortable raising your concern informally with your immediate line manager, who we hope will be able to resolve it for you or as an LPC member with the Chair of your LPC.

If this does not resolve matters, or you feel it isn't possible to raise your concerns this way you can raise it formally by contacting the following:

- CPSS designated lead person for handling concerns, Sarah Davis, HR Lead at CPSS at [sarah.davis@boots.com](mailto:sarah.davis@boots.com)
- As an LPC member you can contact the Governance Lead on your committee. Their names are published on the relevant LPC page.

All these people will be trained in receiving concerns and will give you information about where you can go for more support.

### **Advice and support**

You can also contact the [NHS Whistleblowing Helpline](#) or your union representative (if you have one).

### **How should I raise my concern?**

You can raise your concerns with any of the people listed above in person, by phone or in writing (including email). Whichever route you choose, please be ready to explain as fully as you can, the information and circumstances that gave rise to your concern.

### **What will we do?**

We are committed to listening to our staff and committee members, learning lessons and improving our service. On receipt the concern will be recorded, and you will receive an acknowledgement within two working days. The central record will record the date the concern

was received, whether you have requested confidentiality, a summary of the concerns and dates when we have given you updates or feedback.

### **Investigation**

We will investigate all concerns – using someone suitably independent (usually from a different part of the organisation) and properly trained – and we will reach a conclusion within a reasonable timescale (which we will notify you of). The investigation will be objective and evidence-based and will produce a report that focuses on learning lessons to prevent problems recurring.

We may decide that your concern would be better looked at under another process. For example, our process for dealing with bullying and harassment. If so, we will discuss that with you.

Any employment issues identified during the investigation will be kept separate.

### **Communicating with you**

We will treat you with respect at all times and will thank you for raising your concerns. We will discuss your concerns with you – to ensure we understand exactly what you are worried about. We will tell you how long we expect the investigation to take and keep you up to date with its progress. Wherever possible, we will share the full investigation report with you (while respecting the confidentiality of others).

### **How will we learn from your concern?**

The focus of the investigation will be on improving the service we provide. Where it identifies improvements that can be made, we will track them to ensure necessary changes are made and are working effectively. Lessons will be shared across CPSS, or more widely, as appropriate.

### **CPSS Exec oversight**

The CPSS Exec team will be informed of all concerns raised by our staff and committee members and what we are doing to address any problems. They support the raising of concerns and want you to feel free to speak up.

### **Making a ‘protected disclosure’**

To be covered by whistleblowing law when you raise your concern (to be able to claim the protection that accompanies it) you must reasonably believe two things:

- i. you are acting in the public interest (so your concern needs to be more than a personal grievance); and
- ii. your disclosure shows past, present or future wrongdoing that falls into one or more of the following categories:
  - criminal offence
  - failure to comply with a legal obligation
  - a miscarriage of justice
  - danger to the health or safety of any individual

- damage to the environment and/or
- covering up the wrongdoing in the above categories

CPSS also agrees that you may provide information to the General Pharmaceutical Council or to NHS England which includes an allegation of a serious nature which you reasonably believe to be substantially true, but disclosure of it is not a “protected disclosure” within the meaning given in section 43A of the Employment Rights Act, provided that you do so in good faith and not for purposes of personal gain. If you do CPSS undertakes to protect your right not to be subjected to any detriment or to dismissal as a consequence of that act.

Reviewed: 27<sup>th</sup> March 2025  
Next Review Date: March 2027

