



Skylight Psychiatry
Autism, ADHD and Mental Health Specialists

Whistleblowing & Freedom to Speak Up

Policy and Procedures

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Skylight Psychiatry Ltd is trading as **Skylight Psychiatry**

Whistleblowing & Freedom to Speak Up Policy and Procedures, V3.2, 2026

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Introduction

Whistleblowing is the term used when you report something you see or have found out about that you consider to be wrong. In most cases this can be reported to your line manager. If you cannot or do not wish to do this for any reason, then you should follow the procedure set out below.

Policy Statement

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

Scope

This policy and the procedures apply to all persons who have a contract to carry out work for Skylight Psychiatry personally. It does not apply to genuinely self-employed contractors who run a profession or business on their own account.

Procedures

Skylight Psychiatry recognises that raising concerns about wrongdoings can be one of the most difficult and challenging things to do in a work environment. Under this policy you may come forward with legitimate concerns without fear of being blamed or of any reprisal. You will not be disadvantaged for raising what you consider to be a legitimate concern.

What wrongdoings should be raised?

If you genuinely believe that we, or any of our staff members have taken, are intending to take or have failed to take action that you reasonably believe could lead or amount to:

- unsafe patient care
- inadequate training for staff members
- lack of, or poor response, to a patient safety incident
- 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 a wrongdoing in any of the areas above.

The Public Interest Disclosure Act 1998 provides protection for workers 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 you believe is likely to happen in the near future. Concerns over issues that affect the worker personally or relate to employment conditions should be raised using the appropriate company procedure, likely to be either the Grievance Policy or the Bullying and Harassment Policy.

Feel safe to raise your concern

- Skylight Psychiatry will not tolerate the harassment or victimisation of anyone who is honestly raising a concern. Victimisation of someone because they are speaking up would be a breach of our values and could result in disciplinary action. If you are raising a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of reprisal as a result. Provided you are acting honestly, it doesn't matter if you turn out to be mistaken or if there is an innocent explanation for your concerns.
- Remember that if you are a healthcare professional you may have a professional duty to report a concern. If in doubt, please raise it.

Can I raise a concern anonymously?

- Anonymous reporting is discouraged as it may prevent us obtaining further information in relation to the concern raised and prevent a full investigation from taking place. You can make a protected disclosure where we will assure you of confidentiality unless we are required to disclose your identity by law.

How do I raise a concern?

If possible, you should raise your concern internally. You can raise a concern by speaking with your line manager, a member of the Senior Leadership Team, or the Freedom to Speak Up Guardian.

Written concerns:

Where staff do not feel able to raise a concern verbally, they may submit their concern in writing via a confidential senior leadership contact route. This route is monitored by senior leaders only and is managed separately from general enquiries and complaints.

Staff may request details of the confidential written route from the Freedom to Speak Up Guardian, or a member of the Senior Leadership Team.

You should provide as much detail as possible, including anything you have witnessed, any evidence you have obtained and the dates and times of incidents occurring, as appropriate. If you attend a meeting you can bring a companion with you, if you wish, for moral support.

If you really feel you are unable to raise your concern internally you may make a disclosure to a relevant regulatory authority. If you are considering reporting your concerns outside of Skylight Psychiatry you are strongly advised to seek legal advice for your own protection. Organisations such as Protect, an independent charity providing legal advice, can provide this. The matter will be fully investigated with you, and with other people that you believe are involved with or connected to the suspected wrongdoing, by an appointed independent investigating officer who may be internal or external to the Company.

Freedom to Speak Up concerns are managed under this policy and are not handled as routine enquiries or complaints.

Freedom to Speak Up

Skylight Psychiatry has an appointed Freedom to Speak Up Guardian. They act impartially to provide advice and support staff at any stage of raising a concern.

The role of the Freedom to Speak Up Guardian

Freedom to Speak Up Guardians have been appointed throughout the NHS and private sectors, have a key role in helping to raise the profile of raising concerns in their organisations. They provide confidential advice and support to staff in relation to concerns they have, in particular about patient safety and the quality of care. Rahela's role at Skylight Psychiatry is to:

- Work with senior leadership to create an open culture
- listening and learning, not blaming.
- Develop ways to encourage staff to speak up
- Review the governance and practice of raising concerns at the company
- Share learning with the wider company to develop a positive culture
- Make sure that there are no repercussions to a staff member who chooses to speak up

About the Freedom to Speak Up Guardian

Our Freedom to Speak Up Guardian is Rahela Choudhury. She can support you to speak up if you feel unable to do so by other routes. The guardian will ensure that people who speak up are thanked for doing so, that the issues they raise are responded to, and that the person speaking up receives feedback on the actions taken.

The Freedom to Speak Up Guardian has a key role in helping to promote a positive speaking up culture throughout the company. They operate impartially and objectively, whilst working in partnership with individuals and groups throughout the company, including senior leadership.

While she doesn't get involved in undertaking any investigations herself, she does support workers to speak up and escalate workers speaking up matters on their behalf whenever workers feel that they are unable to do so by other routes.

Where a Freedom to Speak Up concern requires escalation, this will be reviewed by an appropriate senior leader who is not implicated in the concern.

The individual the matter is escalated to will be responsible for reviewing the information provided, agreeing the next steps which may be a local resolution or initiating an investigation by an independent investigator. If you speak up openly, the independent investigator is expected to make contact with you at the outset of any investigations. If the concerns are to be investigated under an HR policy, the relevant processes, procedures and timescales will apply.

Freedom to Speak Up Investigations should be completed within 20 working days in most cases and where this is not likely to be possible, the individual the matter has been escalated to will inform the Freedom to Speak Up Guardians of this. The individual the matter has been escalated to will contact the Freedom to Speak Up Guardian about any actions and outcomes.

During any investigation process, the Freedom to Speak Up Guardians will keep in touch with the worker who has spoken up regarding progress. The feedback on the actions taken as a result of any investigation will be shared with the person who has spoken up and a copy of the investigation report will be submitted to the Freedom to Speak Up Guardian who will log the findings and recommendations. Any lessons learnt may be shared across the company for the purpose of improvement.

You should be aware that if you speak up anonymously to the Freedom to Speak Up Guardian, the same process will be followed as far as practicable but due to the possible limitations of the information received this may limit the Skylight Psychiatry's ability to investigate and resolve the matter, protect or feedback the outcome of any investigation.

Where the Freedom to Speak Up Guardian is part of the senior leadership team, or where a real or perceived conflict of interest exists, the matter will be escalated to an alternative senior leader and/or an external independent investigator/advisor as appropriate to maintain impartiality.

What will happen next when you raise a concern?

The person you have raised the concern with will listen to you and consider the concern(s) you have raised and decide what, or if, further action is needed. You will be informed who else may need to be spoken to. Generally, the Registered Manager will need to be informed and they will consider any actions to be taken.

Where possible you will be kept informed about the actions which are proposed or are being taken. This may not always be possible where we are under a duty to protect the confidentiality of any other people that are involved.

If you do not feel your concern has been dealt with appropriately you may address any concerns you have about the way the matter has been dealt with or, if you disagree with the outcome, with the Registered Manager.

By speaking up, you will help us to keep improving our services for patients, as well as the working environment for our staff members. We will identify where improvements can be made and will track them to make sure changes are made and are working properly. Lessons will be shared with teams across the organisation, or more widely if appropriate.

Giving you support

It is understandable that staff members may feel that they will be 'singled out' for making a disclosure that they believe to be in public interest. We will take every step to ensure that if you raise a legitimate concern you will be protected and supported. We may take appropriate action against any person found to be:

- victimising another person for using this procedure (please tell a member of the management team if you think you have been victimised, or raise it formally under the grievance procedure if the matter is not remedied)
- deterring any person from reporting genuine concerns under this procedure. If you think you have been deterred, you can raise the matter formally under the grievance procedure (if the matter is not remedied).

If we find that people have done either of the above, we may take disciplinary action against them, which may result in their dismissal. If we find that you have made a disclosure of false or misleading information under this Policy maliciously, for personal gain, or otherwise in bad faith then our investigation may potentially result in us taking disciplinary action against you, which may lead to your dismissal.

Additional support / anonymous whistleblowing

If you need more support, you can contact SeeHearSpeakUp (to which Skylight Psychiatry is enrolled). You can do this either online, via telephone (01224 049782) or email via <https://aabpeople.com/contact/>
Further information about the service can be found here:
<https://www.seehearspeakup.co.uk/>

Status of this Policy

This policy does not give contractual rights to any member of staff. Skylight Psychiatry reserves the right to make amendments to or change the content of the policy at any time. Any changes will be communicated to all workers.

Monitoring

Monitoring of incidents raised under this policy will be via a Whistleblowing Incident Log. This will be reviewed on a monthly basis.

Related Policies and Procedures

Bullying and Harassment Policy and Procedures
Complaints and Compliments Policy and Procedures
Confidentiality Policy and Procedures
Duty of Candour Policy and Procedures
Grievance Policy and Procedures
Safeguarding Adults Policy and Procedures
Safeguarding Children Policy and Procedures

Legislation and Guidance

Public Interest Disclosure Act 1998
From the Government website:

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[Whistleblowing: guidance and code of practice for employers - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/whistleblowing-guidance-and-code-of-practice-for-employers)

[Whistleblowing for employees - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/whistleblowing-for-employees)

Protect, [Protect \(formerly Public Concern at Work\) Speak up stop harm - Protect - Speak up stop harm \(protect-advice.org.uk\)](https://www.gov.uk/guidance/whistleblowing-for-employees)