

Audit and Risk Assurance Committee

Meeting Date	10 June 2026
Title	Freedom to Speak Up Annual Report 2025-26
Author(s)	Anna Raftery, Head of Assurance and Compliance Claire Baker, Head of Adjudication Performance
Executive Sponsor	Bernie O'Reilly, Chief Executive
Executive Summary	
<p>This is the first annual Freedom to Speak Up report. The Freedom to Speak Up (FTSU) Guardian function was successfully established at the start of 2026, with 15 concerns raised in the first year, most commonly relating to workload, management behaviour and HR processes. The Guardians have also continued to learn and make improvement over the year, already committing to continue this in 2026-27.</p> <p>The purpose of the report is to provide insight and assurance that concerns are being appropriately supported and acted upon, with a combination of escalations, individual-led action, and organisational learning outcomes. These outcomes include policy reviews, training and audit activity.</p> <p>Staff awareness of how to raise concerns is high and improving, however confidence that concerns will be addressed is lower and has slightly declined, indicating a key area of cultural and governance focus.</p> <p>The areas of improvement identified for this year include, improving accessibility and confidentiality, Continued outreach including the in person corporate inductions, working with HR and Communications to improve outreach and learning outcome awareness.</p>	
Action required	The Committee is asked to review the information provided and seek clarification on any areas.
Previous consideration	Reviewed by the Executive Leadership Team (ELT) on 26 May 2026
Next steps	This is an annual report and will be submitted to ARAC each Q1.
Financial and resource implications	None as a result of this paper.

Item 10

Associated strategic priority/priorities	Technology-enabled regulatory excellence and organisational sustainability
Associated strategic risk(s)	5.a The resources we require to achieve our strategy are not in place or are not sustainable 5.b Our organisational values are not reflected at all levels of the organisation, leading to staff not feeling supported/trusted/listened to
Risk appetite	People - open
Communication and engagement	Will work with comms to support further outreach with internal staff.
Equality, diversity and inclusion (EDI) impact and Welsh language standards	The FTSU initiative supports the HCPC in meeting EDI goals but providing appropriate support to address discrimination and bullying that may happen.
Other impact assessments	Not applicable
Reason for consideration in the private session of the meeting (if applicable)	Not applicable

Freedom to Speak Up Annual Report March 2025 to April 2026

1. Introduction from Bernie O'Reilly, Chief Executive Officer

- 1.1. Our two Speak Up Guardians play an important role in ensuring we have a culture whereby colleagues across the HCPC feel safe raising concerns. Speaking up about wrongdoing, misconduct or risks without being fearful of retaliation from an individual or the HCPC should be a given. However, the reality is we have to work hard to give colleagues the confidence and trust to do just that, whereby they know their concerns will be dealt with appropriately.
- 1.2. Speaking up can enable colleagues like me to address issues I may not have been aware of before it's too late. This helps us to protect the reputation and legitimacy of the HCPC as both a regulator and employer. We can never be complacent with speaking up and should always recognise there is a trust deficit we have to work hard to overcome. We should also be relentless in reminding colleagues of the presence and role of our Guardians.
- 1.3. The success of our Guardians is not as simple as lots of reports or no reports - it is more complex and includes the benchmarking in the Pulse survey in awareness and confidence. People feeling psychologically safe to raise a concern if they have one and the HCPC having the right processes and governance in place to deal with them is a better indicator of success.

2. Background

- 2.1. Sir Robert Francis' 2013 Report of the Mid Staffordshire NHS Foundation Trust Public Inquiry highlighted the need for openness, transparency and candour throughout the healthcare system about matters of concern.
- 2.2. The establishment of the National Guardian's Office (NGO) has provided the systems and spaces for concerns to be raised safely. They lead, train and support a network of Freedom to Speak Up Guardians in England. Freedom to Speak Up Guardians support workers to speak up when they feel that they are unable to in other ways.

- 2.3. The HCPC has a number of avenues available for colleagues to speak up. The Speak Up Guardian initiative for colleagues was launched by the Chief Executive in October 2024 to be an alternative route for those, who, for whatever reason, did not feel able to approach for example, their line manager, head of department or HR.
- 2.4. It was felt the Speak Up Guardians needed to be at a senior level to ensure they were able to address concerns with the appropriate authority. Appointments to the Speak Up Guardian role were made internally through an expressions of interest process.
- 2.5. Anna Raftery, Head of Assurance and Compliance and Claire Baker, Head of Adjudication Performance were appointed to the Speak Up Guardian roles in November 2024 and undertook various training in order to deliver the role and support the organisation.
- 2.6. This is the first annual report covering the period March 2025 – April 2026, written by the Speak Up Guardians, explains the measures taken to embedding the new initiative into the organisation. And how the concerns raised are supporting the HCPC in promoting a culture of openness and engagement as well as supporting our commitment to learning and continuous improvement.

3. Embedding the new initiative

- 3.1. Following our appointment to the role, we undertook various training and development activities which included:

Training through the NGO which included eLearning modules as well as coaching session with an established Freedom to Speak Up Guardian.

Accreditation in ACAS Certification in Internal Workplace Mediation course

Meeting with the GMC's Freedom to Speak Up Guardians who provided support and advice

- 3.2. It has been important over the last year to embed the new initiative into the organisation. Our work across all levels of the organisation. We have attended all employee briefing, as well as meeting with every team to promote the role and its purpose.
- 3.3. We have attended all in-person corporate inductions to ensure any new starters are clear on their avenues for speaking up, the specific roles of the Speak Up Guardians and how to contact them. Visibility has also been improved on the intranet which includes a dedicated page to speaking up and case studies of the types of concerns employees might raise with the us.

3.4. The organisation has developed a speaking up (whistleblowing) policy. The policy provides the different options available to speak up, the support available from the Speak Up Guardians.

3.5. Following the publication of the NMC report into whistleblowing in September 2025, the Speak Up Guardians met with the Chief Executive to review and take forward any learning for the organisation. The actions following this included:

- additional questions in the Q3 pulse survey around speaking up to give us reassurance that employees know how to raise concerns and the confidence in the concern being addressed;
- a review of the speaking up (whistleblowing) policy to improve the language around confidentiality (changes were approved by the Council on 4 December 2025);
- updated reporting arrangements to make clear that reporting to the People and Resources Committee will take place in addition to the existing reporting to the ARAC. This will ensure that issues related to the culture in the HCPC are overseen and monitored by the relevant committee; and
- a review of the Speak Up Guardian escalation process.

3.6. We have also fed into the new mandatory speaking up (whistleblowing) training which has been rolled out to all colleagues across the organisation.

4. Concerns raised in March 2025 – April 2026

4.1. In the first year delivering the freedom to speak up scheme, 15 people came to the Speak Up Guardians to raise concerns and seek support. There were no internal whistleblowing disclosures in 2025-26.

Directorate	Raised	Regarding
Corporate Affairs	1	0
Education, Registration and Regulatory Support (ERRS)	1	0
FTP and Tribunal Services	13	13
Resources	0	1
Other: Employee network	N/A	1

4.2. In order to maintain confidentiality and anonymity with such low numbers, we will not be reporting on the departments of those who raised concerns or concerns were raised against. Instead, this report focuses on the areas the concerns were regarding.

Concern related to	Number raised
Senior managers behaviour <ul style="list-style-type: none"> • Approach to decision making • Behaviour in a shared meeting • Bullying 	4
How HR process was managed <ul style="list-style-type: none"> • Return to work • Flexible/hybrid working request 	3
Workload expectations <ul style="list-style-type: none"> • From direct line manager • From a senior team in same department 	7
Employee network support <ul style="list-style-type: none"> • Lack of support from an employee network 	1
Total	15

4.3. With each person who came forward, we ensured they were provided with unbiased support and given a safe space to talk through everything they wished to raise to us. By understanding what outcome the individual was looking for we were able to signpost, advise, or even escalate on their behalf. If we were asked to anonymously escalate, we also ensured that the person understood this did limit in some ways what could be done.

Action taken	No.
Escalated by Speak up Guardian	9
Individual acted	6
Signposting only	5
No further action	3

4.4. More than one action may have been taken from someone speaking up. For example, in some instances the individual was encouraged to raise concerns where they felt able to do so but we also agreed to escalate to a senior manager to make them aware of the concerns and take forward any learning.

4.5. Some of the outcomes implemented as a result of these individuals speaking up include:



5. Mediation

5.1. In the reporting period one mediation request came from HR to one Guardian to support effective communication between an employee and their manager from Education, Registration and Regulatory Standards.

5.2. Following individual conversations with the Guardian, both parties agreed to have a joint session. Throughout this session the Guardian facilitated effective communication, acting as support and facilitator for the parties in order to reach a positive route forward for them to continue to work together. Both parties also fed back positively on the mediation process, saying they found the process valuable.

6. Pulse Survey

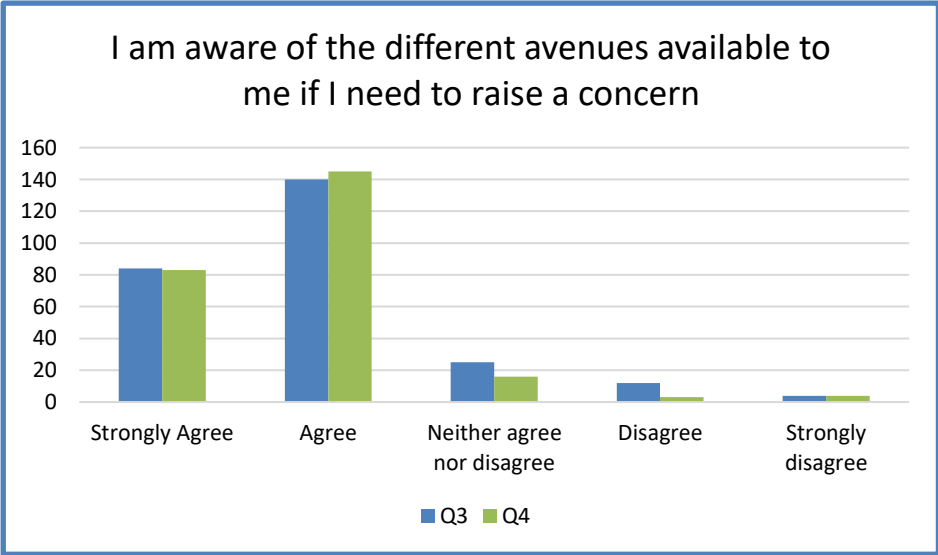
6.1. From the Q3 Pulse Survey, two additional questions were included to provide insight into employees confidence in speaking up. These questions were:

How strongly do you agree or disagree with the following statements about Speaking up at the HCPC?

- a. I am aware of the different avenues available to me if I need to raise a concern
- b. I feel confident any concerns raised would be addressed

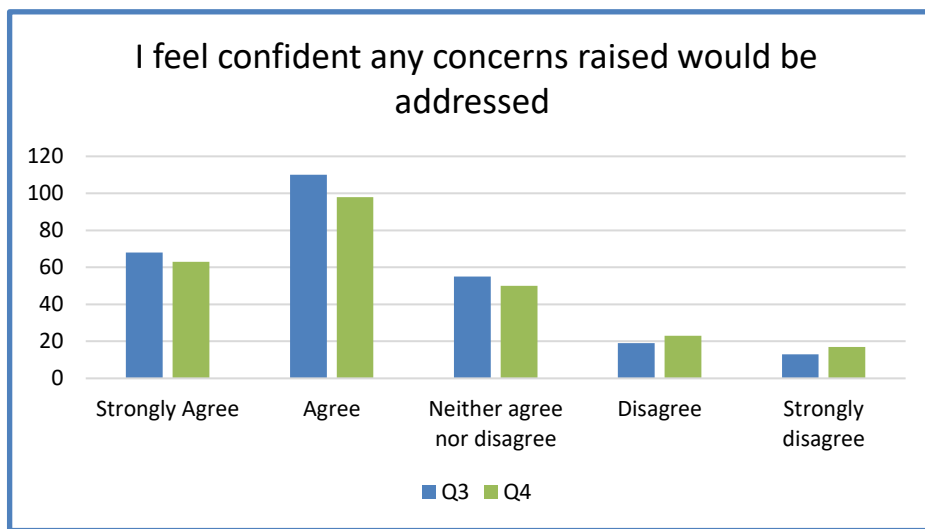
6.2. The Pulse Survey received 265 responses in Q3 and 251 in Q4 across a wide range of departments and roles, providing a robust and representative snapshot of staff perceptions of speaking up across the organisation.

6.3. Overall awareness of how to raise concerns is strong. 85% of respondents in Q3, agree or strongly agree that they are aware of the different avenues available to raise a concern. This increased to 91% of respondents in Q4,



showing an increase in awareness. Negative responses (disagree or strongly disagree) reduced notably from 6% combined in Q3 to 3% in Q4. This indicates that the speaking-up policy and routes are well communicated and understood.

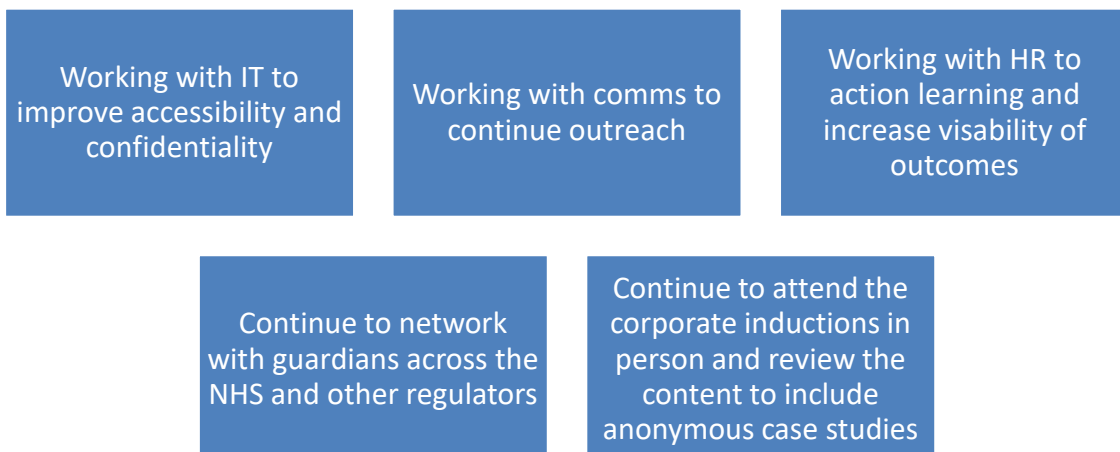
6.4. Confidence that concerns raised would be appropriately addressed is positive but notably lower than awareness. 67% of respondents in Q3 agree or strongly agree that concerns would be addressed, which reduces to 64% in Q4. Neutral responses reduced slightly from 21% to 20%, and negative responses (disagree or strongly disagree) increased from 12% in Q3 to 16% in Q4. This suggests that while staff know how to speak up, confidence in outcomes is less consistent.



6.5. These findings support the need for continued emphasis not just on routes to speak up, but on visible follow-through and trust in how issues are handled.

7. Next Steps

7.1. Reflecting over the first year of the Speak Up Guardians being in place, next steps have been identified to support better awareness and accessibility.



8. Conclusion

- 8.1. We have found the last year rewarding and insightful in a way that neither of us expected. This has been an important new initiative for the organisation to ensure employees feel supported and encouraged to speak up and that their concerns are addressed and utilised for improvement.

- 8.2. The role presents its own challenges with ensuring that the purpose of the Speak Up Guardians is regularly promoted across all areas of the organisation whilst also maintaining boundaries, independence and ensuring confidence and trust in the positions. The opportunity in the role has positively contributed to the overall culture of the HCPC, where speaking up is not only welcomed but valued as an opportunity to learn and improve.