

## Integrated Care Board

<b>Date of meeting</b>	27 November 2025
<b>Title of paper</b>	Freedom to Speak Up Annual Report
<b>Presented by</b>	Asim Patel, Freedom to Speak Up Executive Lead
<b>Author</b>	Asim Patel, Freedom to Speak Up Executive Lead Sarah Mattocks, Freedom to Speak Up Guardian Rachel Holyhead, Freedom to Speak Up Guardian
<b>Agenda item</b>	19
<b>Confidential</b>	No

<b>Executive summary</b>				
<p>This paper provides an annual overview of the developments in relation to the ICB Freedom to Speak Up (FTSU) service. This includes the developments that have been made in the workplan, raising awareness of the service via proactive mechanisms, and responding to concerns raised.</p> <p>The national picture for FTSU is evolving in line with wider health reform. This paper will outline these changes and the continued importance of the ICB FTSU service.</p>				
<b>Public and Stakeholder Engagement</b>				
<p>Quarterly reporting takes place to the multi partner membership of the People and Culture Committee.</p> <p>The ICB workforce is kept updated on the service via Team Briefings and staff communications.</p>				
<b>Recommendations</b>				
The Board are asked to note the Freedom to Speak Up Annual Report.				
<b>Which Strategic Objective/s does the report relate to:</b>				<b>Tick</b>
SO1	Improve quality, including safety, clinical outcomes, and patient experience			✓
SO2	To equalise opportunities and clinical outcomes across the area			
SO3	Make working in Lancashire and South Cumbria an attractive and desirable option for existing and potential employees			✓
SO4	Meet financial targets and deliver improved productivity			
SO5	Meet national and locally determined performance standards and targets			✓
SO6	To develop and implement ambitious, deliverable strategies			✓
<b>Implications</b>				
	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Comments</b>
Associated risks		✓		
Are associated risks detailed on the ICB Risk Register?			✓	
Financial Implications		✓		

<b>Where paper has been discussed</b> (list other committees/forums that have discussed this paper)				
<b>Meeting</b>	<b>Date</b>			<b>Outcomes</b>
N/A				
<b>Conflicts of interest associated with this report</b>				
N/A				
<b>Impact assessments</b>				
	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Comments</b>
Quality impact assessment completed			✓	
Equality impact assessment completed			✓	
Data privacy impact assessment completed			✓	
<b>Report authorised by:</b> Asim Patel, Freedom to Speak Up Executive Lead				

# Integrated Care Board – 27 November 2025

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## Freedom to Speak Up Annual Report

### 1. Introduction

- 1.1 Freedom to speak up (FTSU) is an important part of creating a safe and open culture within the Lancashire and South Cumbria (L&SC) Integrated Care System. This paper provides an annual report to the Board on the progress made with systems and processes in this remit, updates against the themes and trends related to speaking up and the actions being taken in this regard, and provides some national context in this field.
- 1.2 The purpose of the report is to provide developmental updates on how the FTSU service works to embed a positive culture within the organisation. The report will highlight both the reactive and proactive elements offering greater assurance in relation to visibility within the organisation and the progress with building the foundations to enable a period of growth and maturity that will ensure the FTSU service is equipped to undertake all the fundamental aspects of its role.

### 2. Operating context

- 2.1 The Thirlwall inquiry remains ongoing. This inquiry has been set up to examine events at the Countess of Chester Hospital and their implications following the trial, and subsequent convictions, of former neonatal nurse Lucy Letby. Outcomes from the inquiry are expected to be published in early 2026, from which speak up services will respond. The committee on standards in public life published a paper in March 2025; 'Recognising and responding to early warning signs in public sector bodies'.<sup>1</sup> This paper identified those common themes from recent inquiries and reviews that contributed to the failure of public sector organisations to identify warning signs and act appropriately, and a consistent finding was a failure to listen as illustrated at Figure 1 below. This highlights the importance of ensuring an effective speaking up service which undertakes listening and response and supports open organisational culture, is in place.

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<sup>1</sup> 'Recognising and responding to early warning signs in public sector bodies', March 2025: [Recognising and responding to early warning signs in public sector bodies](#)

## Figure 1: Common themes from recent inquiries

This table identifies themes common to a range of recent inquiries and reviews that contributed to the failure of public sector organisations to identify warning signs and act appropriately. See appendix 1 for some relevant quotations from the reports.

	Theme	Windrush Lessons Learned Review <sup>7</sup>	Ockenden Review <sup>8</sup>	Infected Blood Inquiry <sup>9</sup>	Grenfell Tower Inquiry <sup>10</sup>
1	Failure to listen to and act on concerns raised by employees and/or the public				

- 2.2 The 'Review of patient safety across the health and care landscape'<sup>2</sup> was published on 7<sup>th</sup> July 2025 having been commissioned by the Secretary of State for Health and Social Care. The review was asked to look at 6 specific organisations that were established to either assure - or contribute to improving - the safety of care, while also making reference to the wider landscape of organisations influencing quality of care. One of these organisations was the National Guardians Office. In this regard a recommendation has been made to 'streamline functions relating to staff voice', citing that:

*'the functions of the National Guardian's Office should be aligned with those in commissioner and provider organisations. Placing the responsibility for Freedom to Speak Up Guardians firmly within commissioners and providers should:*

- *raise the profile and importance of staff voice*
- *allow a more rapid response'*

Further to this publication, a letter was issued from NHS England to FTSU Guardians on 13 August 2025 to reaffirm the vital role that Freedom to Speak Up Guardians continue to play across the NHS. The letter confirmed that the role of Guardians will be incorporated into the NHS Standard Contract for 2026/27.

- 2.3 Whilst the ICB awaits some clarity on ICB reform, the FTSU service remains a vital tool in supporting ICB staff and services to create and foster an open culture throughout this time period to transition, and beyond, to ensure that ICB staff and services have an outlet to raise concerns whereby this can't be undertaken locally.
- 2.4 The FTSU service can at times be challenged by capacity against demand. This is currently under review to ensure there is sufficient capacity allocated against required workload.

### 3. Freedom to Speak Up service developments

<sup>2</sup> 'Review of patient safety across the health and care landscape', July 2025: [Review of patient safety across the health and care landscape - GOV.UK](#)

- 3.1 ICBs were required to adopt the national policy for speaking up, this has been in place for the ICB since November 2022. The policy was due for review this year which has been undertaken with some minor changes approved by the Executive Committee in October 2025. As further guidance is released as to developments in FTSU nationally the policy will again be reviewed.
- 3.2 The ICB policy is supported by a Standard Operating Procedure which outlines the systems and processes in place to enable a 'speak up, listen up, follow up' service. This includes an electronic referral form to raise concerns, including the ability to submit this anonymously, and a flowchart on how those concerns will be managed including how support and feedback will be provided. The feedback element of the process is vital to build staff confidence in using the service.
- 3.3 The guardians lead a network of champions. Currently there are seven registered champions in the organisation. This role acts as a point of contact for individuals who require advice and signposting to the support available. Particularly given the vast size of the ICB this role is crucial for providing that local support and advocacy for speaking up. The Guardians and Champions meet six-weekly and work together to support the embedding of an open culture for the ICB. Recruitment to the Champion role is ongoing to ensure the Champions reflect the diversity of our staff.
- 3.4 FTSU has remained a standing item on the staff corporate induction which is a vital opportunity to introduce new staff to the service. These sessions are conducted by the guardians and champions to raise awareness of the agenda and to provide an overview of what the service can offer. Awareness raising has also been undertaken via presentations to all staff briefings, with the last one undertaken in March 2025.
- 3.5 The FTSU executive lead has sent a letter to all guardians in the ICB provider organisations to initiate forming a local network for FTSU in order to share themes and trends, best practice and peer support. On receipt of responses this will be established.
- 3.6 National FTSU week took place between 13-17 October. The theme this year was to raise awareness of follow up in action. Crucially, when we follow up with action, we prove that speaking up leads to real improvements without fear that concerns will be ignored and encourages a greater uptake of the service and a more open culture. A staff communication was circulated at the start of speak up week and this received focus at the People and Culture Committee on 15 October 2025. This described the actions that staff can expect as a result of raising a concern, and improvement actions that have been undertaken recently as a direct result of concerns raised to the service including; staff undertaking additional training and referrals to Human Resources (HR) services.
- 3.7 Further actions taken as a result of cases over the last 12 months include:

<b>Referrals for quality investigations</b>	<b>Referrals to directors and executives for local action</b>	<b>Referrals to HR policies and process</b>	<b>Referrals to inform future reform based staff experiences</b>	<b>Referrals to external regulatory bodies</b>
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#### 4. Themes, trends and lessons learnt

	Q3 Oct-Dec 2024	Q4 Jan-Mar 2025	Q1 Apr-Jun 2025	Q2 Jul-Sep 2025
<b>Patient safety /quality</b>				
<b>Leadership</b>			1	
<b>Behavioural/ relationship</b>	3	1	1	3
<b>System /process</b>	1	2		2
<b>Cultural</b>				5 (x5 individuals from primary care related to one case)
<b>Infrastructure / environment</b>	1			
<b>Staff safety</b>				1

4.1 21 concerns (eligible for reporting) have been raised with the ICB FTSU service between October 2024 and September 2025. A further 5 concerns were reported whereby the referrer either did not consent for the data to be captured for reporting purposes or the concerns were referred externally with no opportunity to capture this consent. This is a slight decrease from the last annual report to board which reported a total of 30 concerns reported in the time period September 2023 to August 2024. The table above identifies that the ICB has seen a trend in peaks and troughs in when concerns are raised, in month 1 of quarter 3 (October to December 2025) there have been 5 concerns raised to date, which exceeds one of the full quarters in the table above, therefore suggesting that there isn't necessarily a decline in uptake of the FTSU service. Of those 21 concerns eligible for reporting, 11 have been closed as these outcomes have been concluded. Of those 11 closed internal management processes within the ICB provided support for resolution and these did not require external input from partners/agencies. Of the 10 open cases, 3 cases have required external involvement; 2 from NHSE, and 1 case involving 5 individuals has required involvement from the CQC.

4.2 The National Guardians Office annual report published in August 2025 based on the reporting period April 2024 and March 2025, showed that the reporting of concerns within Integrated Care Boards increased by 0.8% as follows<sup>3</sup>:

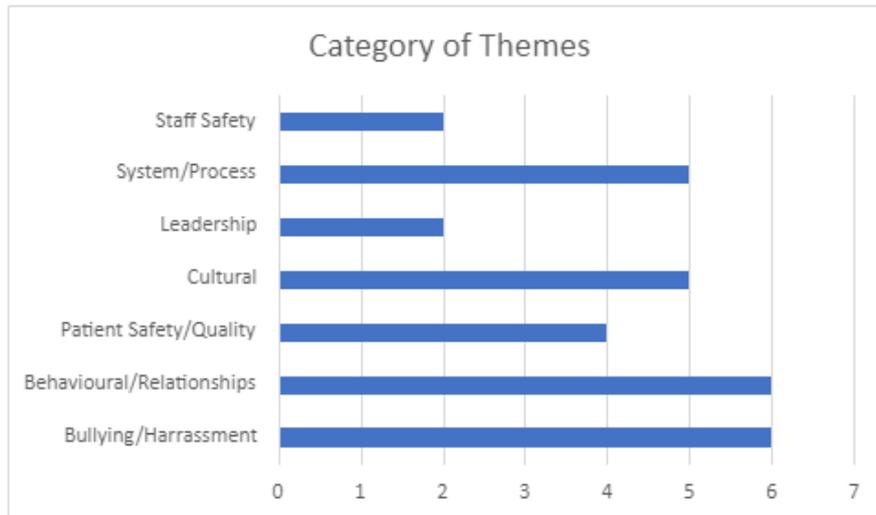
<sup>3</sup> 'Culture is a patient safety issue, a summary of speaking up to freedom to speak up guardians', August 2025, [20250702-Annual-data-report-2425-Publishable-2.pdf](#)

Organisation Type	24/25	23/24	Change from last FY
Arm's length body (ALB)	1.2%	1.1%	0.1%
Hospice	0.6%	0.6%	-
Integrated care board (inc. Integrated care systems)	1.7%	0.9%	0.8%
Independent	5.6%	5.5%	0.1%
NHS trust	88.8%	90.8%	-2.0%
Primary care	1.1%	0.8%	0.3%
Professional body	0.3%	0.0%	0.3%
Social care	0.1%	0.1%	-
Other	0.5%	0.3%	0.2%

4.3 The most commonly reported theme to the LSC ICB service is 'behavioural/relationship'. The organisation is well sighted on this theme from a range of sources including FTSU, staff surveys and pulse surveys. At the most recent People and Culture Committee a paper was received regarding the development of a staff engagement improvement plan including development of an Organisational Development (OD) plan which outlined the values driven work the organisation has implemented and continues to develop to make improvements in this area. Embedding FTSU within the OD plan will reinforce leadership behaviours which are aligned to organisational values and support inclusive, high-performing teams. Through this OD work, the ICB will:

- **Culture & Leadership:** position FTSU as a driver for cultural change, ensuring leaders model transparency and responsiveness.
- **Learning & Development:** Integrate FTSU principles into leadership pathways and mandatory training, using scenario-based learning to build confidence in handling concerns.
- **Data & Insights:** Use FTSU data to inform culture diagnostics and organisational health dashboards, identifying trends for targeted OD interventions.
- **Continuous Improvement:** Continue to use feedback loops where FTSU cases shape OD priorities and enable cross-functional learning between OD and Governance teams.

4.4 The following chart outlines the themes reported in the last annual report to the Board (data range September 2023 to August 2024) and shows that the categories remain largely consistent. It must be noted that the numbers of referrals to the service both in this report and the previous annual report to the board are small in number in comparison to the size of the workforce so cannot be reliably used as a sole indicator for those themes that require action:



4.5 Within the ICB, of the 21 concerns eligible for reporting, 10 of those were raised anonymously. The National Guardians Office annual report also reflects this trend, stating that in ICBs (including integrated care systems) anonymous concerns ‘saw an increase from 11.9% to 25.0%’<sup>4</sup>.

4.6 The ICB FTSU service had determined that whilst the responsibility for hearing concerns originating from primary care is unclear, that the ICB service would hear these and provide support and signposting where possible if brought to the service. To date the FTSU guardians have supported staff within 10 primary care practices.

## 5. Committee reporting

5.1 Routine reporting of speaking up themes and trends continues at the People and Culture Committee. This is supporting the ICB’s aim to work in liaison with system partners on the speaking up agenda as a range of partners are represented in the membership and participants of this committee. An assurance update was also provided to the Audit Committee in July 2025 to support the committee discharge its role to review the adequacy and security of the ICB’s arrangements.

## 6. Conclusion

6.1 The ICB continues to maintain robust systems and processes for speaking up over the last year which are being utilised across the organisation and externally. For the next year the focus will be to build on links with the wider system and to establish the resource model for the service going forward in order to ensure it is sustainable.

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<sup>4</sup> Ibid