



SECTION: HUMAN RESOURCES
POLICY /PROCEDURE: 10.15
NATURE AND SCOPE: POLICY AND PROCEDURE - TRUST WIDE
SUBJECT: SPEAKING UP (previously Raising Concerns Whistleblowing)

The Trust believes that every member of staff should feel able to speak up about any concern about anything they think may be harming patients, staff or the service the Trust delivers

The aim of this policy is to identify how concerns can be raised, to whom and how the Trust will respond.

DATE OF LATEST RATIFICATION: MARCH 2019
RATIFIED BY: EXECUTIVE LEADERSHIP TEAM
IMPLEMENTATION DATE: MARCH 2019
REVIEW DATE: JANUARY 2023

ASOCIATED TRUST POLICIES AND PROCEDURES:

Counter Fraud, Bribery and Corruption - 5.06
Grievance – 10.11
Respect at Work – 10.29
Health, Safety & Welfare – 16.01
Safeguarding Policies – Section 17



NOTTINGHAMSHIRE HEALTHCARE NHS FOUNDATION TRUST

SPEAKING UP

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NOTTINGHAMSHIRE HEALTHCARE NHS FOUNDATION TRUST**SPEAKING UP****1.0 POLICY STATEMENT**

- 1.1 This policy complements the national policy introduced in April 2016 by NHS Improvement and NHS England on Freedom to speak up: raising concerns (whistleblowing) policy for the NHS which is a standard integrated policy, aimed at improving the experience of whistleblowing in the NHS: <https://improvement.nhs.uk/resources/freedom-to-speak-up-whistleblowing-policy-for-the-nhs/>.
- 1.2 Nottinghamshire Healthcare NHS Foundation Trust (the Trust) recognises the need for and the value of a policy which provides all staff with advice/guidance on how to raise concerns about incidents and practices which occur.
- 1.3 The interests of patients and ensuring high quality care are of paramount importance to the Trust. All employees, bank and agency workers, students, volunteers, Governors, Non-Executive Directors and all other paid or unpaid agreement holders therefore have a duty to draw to the attention of managers any matter which they consider to be damaging to patient interests. The Trust encourages those who work in our services to put forward suggestions which may benefit patient care and/or service delivery.
- 1.4 The working environment should encourage and support staff to freely contribute their views on all aspects of health service practice, particularly those relating to delivery of patient care and patient services. It is the responsibility of management to ensure that staff are able to make a constructive contribution and to feel that their ideas are welcomed, valued, and where appropriate, acted upon positively.
- 1.5 All of us at one time or another may have concerns about what is happening at work. Usually these concerns are easily resolved through the line management structure. However, it is acknowledged, when you are troubled about something that involves a danger to patients, public or colleagues, professional misconduct or financial malpractice (including fraud, bribery or corruption) it can be difficult to know what to do.
- 1.6 Staff may be worried about raising such issues; perhaps feeling it is none of their business or that it is a suspicion; that raising the matter would be disloyal to colleagues, to managers or to the Trust; and are not sure what, if anything to do next.
- 1.7 Those using this policy should always be given the assurance that they will not suffer recrimination or disadvantage of any sort providing they follow the procedures set out in this policy and are acting honestly and genuinely.
- 1.8 The Trust would not want this policy to be seen as inhibiting the right of clinicians to express a view in the media if invited to do so on a topic of general interest. Medical, Nursing, Allied Health Professionals and other staff may publish books, articles, etc, and deliver any lecture or speech, whether on matters arising out of his/her healthcare service or not. It must be made clear however, that their views are personal and do not represent the views of the Trust.

2.0 INTRODUCTION

- 2.1 The aim of this policy is to identify how you can raise concerns about anything you believe is harming patients, staff or the service the Trust delivers or is involved in delivering. The Trust believes that every member of staff has a duty to raise concerns about the provision of care within the Trust where it is believed to be inadequate, unacceptable, or unsafe.
- 2.2 The Francis Report (February 2015) recommendations reinforce the importance of raising concerns. This Policy encompasses the principles contained within the recommendations of

the Independent Inquiry with regard to the ability of staff to raise concerns and have their concerns addressed without recrimination.

- 2.3 A key theme amongst recommendations and lessons learnt highlight that engagement with staff is key to promoting an organisational culture of openness and transparency, building trust and confidence to openly disclose and report issues as early as possible

3.0 SINGLE EQUALITY SCHEME

- 3.1 In applying this procedure, managers, employees and their representatives will have regard to the principles and requirements of the Trust's Single Equality Scheme. The Trust is committed to championing a culture of equality, diversity and inclusion. Accordingly the implementation of this policy and its impact will be monitored across all equality strands and reported regularly to the Trust Board.
- 3.2 Managers will not discriminate in the application of this policy and procedure in respect of age, disability, race, ethnic or national origin, gender, religion, beliefs, sexual orientation, marital/partnership status, social and employment status or gender identity.
- 3.3 In all cases, full and sensitive consideration will be given to equality and diversity needs/requirements or issues that may exist when implementing this policy and procedure. It is acknowledged that in some cases, the perceived behaviour of individuals may be a reflection of diverse backgrounds and identities and can be subject to misinterpretation. Therefore, judgments regarding an individual's conduct, capability or performance will always be fully and appropriately informed, which may in some instances, require diversity specific, guidance and advice.

4.0 WHAT CONCERNS CAN I RAISE

- 4.1 You can raise a concern about anything you believe is harming the service the Trust delivers. Some examples of this may include (but are by no means restricted to):
- 4.1.1 concerns about unsafe patient care and where the health and/or safety of an individual has been, is being, or is likely to be endangered;
 - 4.1.2 unsafe working conditions
 - 4.1.3 inadequate induction or training for staff
 - 4.1.4 where a person has failed, is failing, or is likely to fail to comply with any legal and/or professional obligation to which he/she is subject;
 - 4.1.5 where a miscarriage of justice has occurred, is occurring, or is likely to occur;
 - 4.1.6 where a criminal offence has been committed, is being committed, or is likely to be committed
 - 4.1.7 suspicions of fraud (which can also be reported to our local counter-fraud team: 0115 8835320);
 - 4.1.8 where the environment has been, is being, or is likely to be damaged;
 - 4.1.9 where information tending to show any matter falling within one of the preceding paragraphs has been, is being, or is likely to be deliberately concealed.
 - 4.1.10 a bullying culture (across a team or organization rather than individual instances of bullying).

- 4.2 If you wish to raise a concern about your personal employment situation, please use the Grievance Procedure [10.11 Grievance Policy - Nottinghamshire Intranet](#) which is available on the Intranet. Raising a grievance is about a personal complaint regarding your employment situation, i.e. feeling that a manager's decision has affected you personally or that you are not being treated properly.
- 4.3 If your concern is about financial misconduct, fraud, bribery or corruption, please also see the Counter Fraud, Bribery and Corruption Policy & Response Plan 5.06. Any concerns relating to Financial Crime should be reported to the Lead Counter Fraud Specialist, the Executive Director of Finance & Procurement or the NHS Counter Fraud Authority reporting hotline (0800 028 4060). Your concerns will then be investigated in accordance with the Trust's Fraud, Bribery and Corruption Policy
- 4.4 The Trust's approach to enabling staff voice is detailed in **Appendix 3** which underpins the Trust's aim to promote an organisational culture of openness and transparency.

5.0 WHO SHOULD I RAISE MY CONCERN WITH

- 5.1 In the first instance, you can raise your concern with your line manager, or a senior manager if the former is not possible, for all concerns except those relating to Fraud, Bribery or Corruption (financial crime), see section 4.3. Your line manager will confirm the action to be taken, the person responsible for this action and the timescales for action and feedback to you.

If this does not resolve matters or where you do not think it is appropriate to do this, you can raise your concern with any of the following people:-

- the Trust's Freedom to Speak Up Guardian, (Simbi Sibanda). The Freedom to Speak Up Guardian acts as an independent and impartial source of advice to staff at any stage of raising a concern, with access to anyone in the organisation, including the Chief Executive, or if necessary, outside of the organization, including the National Guardian and the Care Quality Commission. The Freedom to Speak Up Guardian will:-
 - treat your concern confidentially unless otherwise agreed
 - ensure you receive timely support to progress your concern
 - ensure you have access to personal support
 - ensure you receive timely feedback on how your concern is being dealt with
 - escalate to the Trust Board any indications that you are being subjected to detriment for raising your concern
- The Trust's nominated Senior Independent Director
- The Trust's Director of Corporate Affairs
- The Trust's Executive Medical Director
- The Trust's Executive Director of Nursing
- The Trust's Chief Executive

- 5.2 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.

- 5.3 If you have a concern about a Director/ Executive Director of the Trust, you can raise your concern (verbally or in writing) directly with the Chief Executive or Chair.

- 5.4 If your concern involves patient safety then you should also contact your divisional safeguarding lead and/or Associate Director of Nursing (or Deputy).

- 5.5 If your concern involves health and safety then you should also contact the Trust Health & Safety Manager.
- 5.6 If, for any reason you do not feel comfortable raising your concern internally, you can also raise your concern formally with the external bodies who are listed in **Appendix 1**.
- 5.7 If you raise a concern you may wish to seek support and/or advice from your trade union representative. In some cases you may wish to seek the advice of a trade union representative or professional body e.g. General Medical Council, Nursing & Midwifery Council, General Dental Council, Health Care Professions Council; before contacting your line manager, Freedom to Speak Up Guardian or the Senior Independent Director.
- 5.8 The process for escalating a concern is given in **Appendix 2**.

6.0 THE TRUST'S ASSURANCE TO YOU

6.1 Your Safety

The Trust Board is committed to this policy is implemented across the organisation. If you raise genuine concerns under this policy, you will not be at risk of losing your job or suffering any form of retribution as a result. Without your help we cannot deliver a safe service and protect the interests of patients, staff and the Trust. If you are worried, we would rather you raised it when it is just a concern than to wait for proof. There is no burden on you as the person raising the concern to establish all the facts and provide all the evidence. Please do not think we will ask you to prove any concern you genuinely raise. Of course, we do not extend this assurance to someone who has maliciously raised a matter they know is untrue.

6.2 Your Confidence

We will not tolerate the harassment or victimisation of anyone raising genuine concerns. However, we recognise that you may nonetheless be anxious. If so, you can ask to talk to someone in private. If you ask us not to disclose your identity, we will not do so without your agreement first. If the situation arises where we are not able to resolve the concern without revealing your identity (for instance because evidence is needed in court), we will discuss with you whether and how we can proceed.

6.3 Anonymous Concerns

Remember that if you do not tell us who you are, it will be much more difficult for your concern to be investigated and for us to give you feedback.

7.0 RESPONSIBILITIES

7.1 Management Responsibilities

All managers have a responsibility to:-

- 7.1.1 take the concerns of staff, bank & agency workers, volunteers, students, contractors seriously, deal with the matter positively and reasonably with due regard to the confidentiality of who is raising the concern;
- 7.1.2 consider the concerns carefully and where appropriate ensure an investigation is undertaken;
- 7.1.3 understand the difficult position the individual(s) may be in when reporting a concern;
- 7.1.4 seek appropriate advice from senior management, the Freedom to Speak Up Guardian, the lead professional or Workforce Advisor

- 7.1.5 take prompt action to resolve the concern or refer it on to an appropriate person;
- 7.1.6 keep the individual(s) regularly informed of the process and progress of any investigation and provide feedback to the individual, including outcomes (while respecting the confidentiality of others);
- 7.1.7 monitor and review any actions required;
- 7.1.8 ensure individuals who genuinely report concerns are not penalised in any way and ensure they are supported appropriately;

7.2 Employee/volunteers/students/agency workers & contractors and all paid and unpaid agreement contract holders responsibilities

The above have a responsibility to:

- 7.2.1 Work within their professional code of conduct (where applicable).
- 7.2.2 Ensure that the best standards of care are provided.
- 7.2.3 Report any concerns that might compromise these standards.
- 7.2.4 Raise concerns with a genuine belief that a wrongdoing has occurred.
- 7.2.5 Not raise concerns with any malicious intent.

7.3 Freedom to Speak Up Guardian

- 7.3.1 Signpost & advise individuals when considering speaking up and raising concerns
- 7.3.2 Raise awareness of how to raise concerns through the available structures and policies
- 7.3.3 Report and feedback themes to the Chief Executive and the Trust Board
- 7.3.4 Ensure any investigations are being progressed and feedback given to staff
- 7.3.5 Act as the link to other NHS organisations and the National Guardian

8.0 REPORTING ISSUES CAUSING CONCERN -WHAT HAPPENS NEXT?

- 8.1 Once you have told us of your concerns, we will look into it to assess initially what action should be taken; this may involve an investigation. We will tell you who is handling this matter, how you can contact them, how long an investigation is likely to take and whether your further assistance is needed. If you request us to do so, we will write to you summarising your concern and setting out how we propose to handle it. We will keep you up to date with the progress of any investigation.
- 8.2 When you raise the concern you may be asked how you think the matter might best be resolved. If you do have a personal interest in the matter, we do ask that you tell us this at the outset. We may decide that your concern would be better looked at under another process, for example the grievance procedure. If so, we will discuss that with you.
- 8.3 Any employment issues (that affect only you and not others) identified during an investigation will be considered separately.
- 8.4 If your concern relates to cases of potential fraud, bribery or corruption the Trust is obliged to refer any suspicions or allegations directly to the Trust's nominated Lead Counter Fraud

Specialist, unless you have already done this. This may involve passing your details on to the nominated specialist for them to speak to you directly about your concerns.

- 8.5 Interviews and investigations in connection with allegations of fraud, bribery and corruption will be undertaken by the Lead Counter Fraud Specialist who will ensure that any investigation is completed observing the relevant legislation and guidelines from NHS Protect.
- 8.6 If your concern relates to patient safety, we may need to involve the relevant safeguarding lead (unless you have already notified them of your concern). If necessary, in the interests of safeguarding a patient/carer/relative or member of staff, information will be shared with the appropriate people and we will inform you of what this will be and the reasons why.

9.0 REFERRAL TO THE CHAIR FOR MATTERS RELATING TO THE CHIEF EXECUTIVE

- 9.1 If your concerns relate to the Chief Executive, you should raise your concerns with the Trust Chair.

10.0 IF YOU ARE DISSATISFIED WITH OUR RESPONSE

- 10.1 If you have raised your concern with us and are unhappy with our response, you can go to the other levels and bodies detailed in **Appendix 1**. While we cannot guarantee that you will be satisfied with our response, our aim is to handle the matter fairly and appropriately. By using this policy and its associated procedure, you will help us to achieve this.

11.0 MAKING A 'PROTECTED DISCLOSURE'

- 11.1 The Public Interest Disclosure Act 1998 (see now Part IVA Employment Rights Act 1996)(PIDA) gives statutory protection to employees who disclose information reasonably and responsibly in the public interest. Qualifying disclosures are disclosures of information about malpractice. This will include: criminal offences, failure to comply with legal obligations, miscarriages of justice, threats to health and safety of an individual, damage to the environment and a deliberate attempt to cover up any of the above.
- 11.2 To be protected, the disclosure must be in the public interest, you must have reasonable belief that the information shows that one of the categories of wrongdoing listed in the legislation has occurred or is likely to occur, and the concern must be raised in the correct way.
- 11.3 There is a defined list of 'prescribed persons' who you can make a protected disclosure to, these bodies are listed in **Appendix 1**.
- 11.4 To help you consider whether you would qualify for protected disclosure within the meaning of the law, please seek independent advice from the Whistleblowing Helpline for the NHS and Social Care www.wbhelpline.org.uk or Public Concern at Work www.pcaw.org.uk

12.0 MONITORING, AUDITING & RECORD KEEPING

- 12.1 The implementation of this policy and its effectiveness will be monitored by the Trust Board annually.
- 12.2 All whistleblowing cases are to be logged on a central register held by the Workforce Organisational Effectiveness team, with oversight by the Senior Independent Director and Director of HR.
- 12.3 All whistleblowing cases are reported to the Workforce, Equality & Diversity Committee on a bi monthly basis.

12.4 All speaking up cases are logged centrally by the Freedom to Speak Up Guardian and reported to the Workforce, Equality & Diversity Committee on a bi monthly basis.

13.0 RELATED DOCUMENTS

13.1 Incident Reporting Guidelines – 15.01

13.2 Grievance Policy – 10.11

13.3 Respect At Work Policy – 10.29

13.4 Counter Fraud, Bribery and Corruption Policy & Response Plan – 5.06

14.0 KEY REFERENCE MATERIAL

14.1 The Francis Report (February 2015)

14.2 Public Interest Disclosure Act 1998

14.3 NHS Improvement & NHS England: Freedom to Speak Up: raising concerns (whistleblowing) policy for the NHS, April 2016

14.0 TRAINING

14.1 Training will be provided to all staff via an e-learning package and to new starters via the Trust induction programme. Training will also be covered in Vision 21 Programme.

15.0 TARGET AUDIENCE

15.1 All Trust employees, volunteers, students, bank workers, agency staff, Governors, Non-Executive Directors and contractors.

16.0 REVIEW DATE

16.1 This policy will be reviewed in three years or in light of organisational or legislative changes.

17.0 CONSULTATION

17.1 TSPF, Divisional Workforce, Equality & Diversity Committees and Trust Workforce, Equality & Diversity Committee and LC.

18.0 LEGISLATION COMPLIANCE

18.1 Public Interest Disclosure Act 1998 (see now Part IVA Employment Rights Act 1996) (PIDA).

20.0 CHAMPION & EXPERT WRITER

20.1 The Champion of this policy is the Executive Director of People & Culture and the Expert Writer is the Freedom to Speak Up Guardian.

APPENDIX 1

Independent advice can be sought from the following bodies:

Whistleblowing Helpline for NHS and Social Care

08000 724725

www.wbhelpline.org.uk

Public Concern At Work

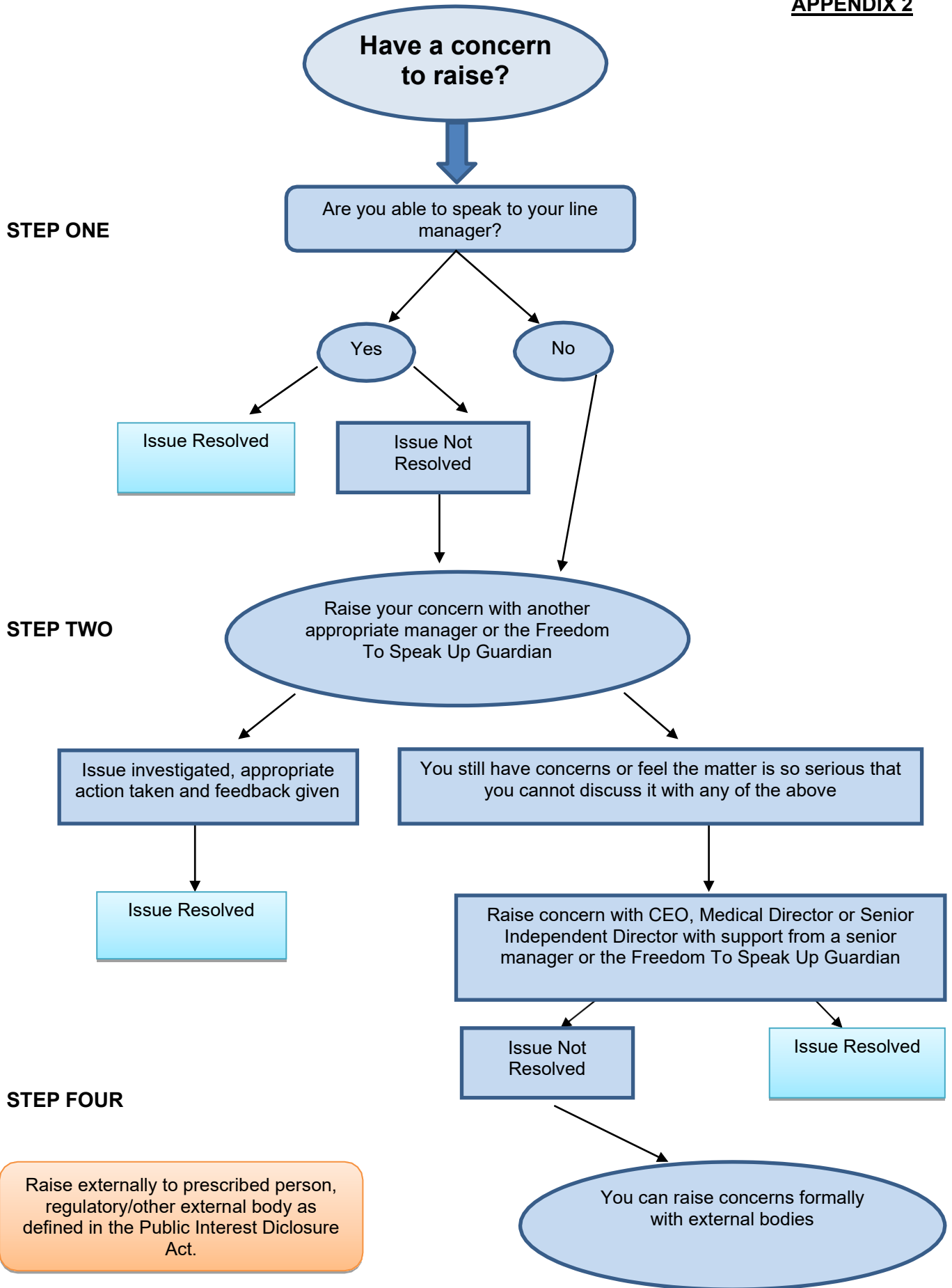
020 7404 6609

www.pcaw.org.uk

External regulatory bodies/prescribed persons	
Care Quality Commission (CQC) Citygate Gallowgate Newcastle upon Tyne NE1 4PA Tel: 03000 616161 www.cqc.org.uk	Healthwatch England Skipton House 80 London Road London SE1 6LH www.healthwatch.co.uk
NHS Improvement Wellington House 133-155 Waterloo Road London SE1 8UG Tel: 0300 123 2257 Email: nhsi.enquiries@nhs.net www.improvement.nhs.net	NHS Protect Skipton House 80 London Road London SE1 6LH www.nhsbsa.nhs.uk
NHS England PO Box 16738 Redditch B97 9PT Tel: 0300 3112233 england.contactus@nhs.net	Health Education England 1 st Floor Blenheim House Duncombe Street Leeds LS1 4PL www.hee.nhs.uk
Health & Safety Executive http://www.hse.gov.uk/contact/concerns.htm	

Professional bodies/prescribed persons	
General Chiropractic Council 44 Wicklow Street London WC1X 9HL Tel: 020 7713 5155 www.gcc-uk.org	General Dental Council 44 baker Street London W1U 7AL Tel: 0845 2224141 www.gdc-uk.org
General Optical Council 10 Old Bailey London EC4M 7NG Tel: 020 75803898 www.optical.org	General Osteopathic Council Osteopathy House 176 Tower Bridge Road London SE1 3LU Tel: 020 73576655 www.osteopathy.org.uk

Health Professions Council Park House 184 Kennington Park Road London SE11 4BU Tel: 0845 3006184 www.hpc-uk.org	Nursing and Midwifery Council 23 Portland Place London W1B 1PZ Tel: 020 76377181 www.nmc-uk.org
General Pharmaceutical Council 25 Canada Square London E14 5LQ Tel: 020 3365 3603 concerns@pharmacyregulation.org	General Medical Council 3 Hardman Street Manchester M3 3AW Tel: 0161 9236399 www.gmc-uk.org





APPENDIX 4

EQUALITY IMPACT ASSESSMENT (EIA) SCREENING TOOL

Name of policy/procedure being assessed:	SPEAKING UP POLICY
Brief description of policy/procedure and reason for EIA:	<p>The aim of this policy is to identify how concerns can be raised, to whom and how the Trust will respond.</p> <p>The Trust believes that every member of staff should feel able to speak up about any concerns they have which they believe may be harming the service the Trust delivers.</p>
Names and designations of EIA group members:	Charlotte Whyman (Senior HR Manager), Helen Auld (FTSU Guardian), ,
List of key groups/organisations consulted	Trust TSPF, LC, All Equality and Diversity Strands.
Data, Intelligence and Evidence used to conduct the screening exercise	Previous policies, staff experience, staff surveys, HR case work, Manager feedback, National Policy

Equality Strand	Does the proposed project/ strategy/ plan/ function etc have a positive or negative (adverse) impact on people from these key equality groups? Please describe	Are there any changes which could be made to the proposals which would minimise any adverse impact identified? What changes can be made to the proposals to ensure that a positive impact is achieved? Please describe	Have any mitigating circumstances been identified? Please describe	Areas for Review/Actions Taken (with timescales and name of responsible officer)
Race	No positive or negative impact identified. This policy applies to all Trust employees inclusive of diversity strands as is governed by UK legislation and national policy.	No as this policy is governed by national policy and legislation and does not discriminate on individuals based on E & D strands or other self identification.	Yes, national policy and UK law specifies the nature of this policy.	Whilst the policy applies to all Trust employees inclusive of all diversity strands, data shows that BME staff are less likely to raise concerns and do not feel confident to raise concerns. The Trusts FTSU Guardian is undertaking specific work across the organization to address this.
Gender	No positive or negative impact identified. This policy applies to all Trust employees inclusive of diversity strands as is governed by UK legislation and national policy.	As above	As above	
Disability	No positive or negative impact identified. This policy applies to all Trust employees inclusive of diversity strands as is governed by UK legislation and national policy.	As above	As above	
Religion/Belief	No positive or negative impact identified. This policy applies to all Trust employees inclusive of diversity strands as is governed by UK legislation and national policy.	As above	As above	
Sexual Orientation	No positive or negative impact identified. This policy applies to all Trust employees inclusive of diversity strands as is governed by UK legislation and national policy.	As above	As above	

Age	No positive or negative impact identified. This policy applies to all Trust employees inclusive of diversity strands as is governed by UK legislation and national policy.	As above	As above	
Social Inclusion	No positive or negative impact identified. This policy applies to all Trust employees inclusive of diversity strands as is governed by UK legislation and national policy.	As above	As above	
Community Cohesion	N/A.	n/a.	n/a.	
Human Rights	No positive or negative impact identified. This policy applies to all Trust employees inclusive of diversity strands as is governed by UK legislation and national policy.	As above	As above	

Conclusions and Further Action (including whether a full EIA is deemed necessary and agreed date for completion)	Following the EIA screening exercise it has been concluded that a full EIA is not needed. This policy is an organisational interpretation of national policy and consequently applies to all Trust employees inclusive of diversity strands.
Screening Tool Consultation End Date	-
Name of Responsible Officer Name and Contact Details (tel. e-mail, postal)	Charlotte Whyman Nottinghamshire Healthcare NHS Foundation Trust Tel: 0115 9691300 ext 11194 charlotte.whyman@nottshc.nhs.uk

APPENDIX 5

Policy/Procedure for: Speaking Up Policy

Issue: 9

Status: APPROVED

Author Name and Title: Freedom to Speak Up Guardian

Issue Date: MARCH 2019

Review Date: JANUARY 2023

Approved by: EXECUTIVE LEADERSHIP TEAM

Distribution/Access: NORMAL

RECORD OF CHANGES

DATE	AUTHOR	POLICY/ PROCEDURE	DETAILS OF CHANGE
11.06	J Fleet	PE/22	Changes to house style and review date
11/08	K Waters	PE/22	Changes throughout
08/10	O Fulton	11.09	House style changes. Single equality scheme, definition of whistleblowing, employer, employee responsibilities, designated officer, chair and Chief executive referrals, external and regulatory bodies. Disclosure outside of the Trust.
08/13	J Cynik	11.09 (Issue 6)	Minor changes throughout to update terminology and further additions to strengthen monitoring and recording requirements. New appendix for further information and contact details for professional and regulatory bodies
May 14	P Hall	10.15	Change in policy number Change other referenced policies to reflect updated numbers
Oct 2016	C Whyman	10.15 (Issue 6)	Changes throughout
Dec 2017	C Whyman	10.15 (Issue 7)	Changes to house style, Author
Feb 18	C Whyman	10.15 (Issue 8)	New appendix on staff voice infographic included.
March 19	C Whyman	10.15 (Issue 9)	Changes made throughout as a result of recommendations from the NGO report. Change to policy name, previously Raising Concerns Whistleblowing Policy.
January 2022	S Sibanda	10.15 (Issue 9)	Update to section 5.1
January 2022	L West	10.15 (Issue 9)	Review date extended by 12 months

Dec 2022	L West	10.15 (Issue 9)	Review Date extended until January 2023
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