Conclusions:
The changes shift responsibility for speaking up arrangements to local organisations, requiring stronger internal leadership, clear governance, and commitment to maintaining safe and effective speaking up cultures.

Recommendations:

- Ensure organisational arrangements meet new requirements, including publishing clear contact routes for guardians.
- Confirm systems are in place to submit accurate data through the national process.
- Provide ongoing training, supervision, and professional development for guardians.
- Maintain access to independent psychological support for guardians.
- Support engagement in networks and shared learning to sustain improvement.

The Paper/Report is Presented for: *(Tick all that apply)*

☑ **Approval** ☐ **Assurance** ☐ **Discussion** ☐ **Information**

Approval	Receive and discuss the paper/report and approve its recommendations or decide on a particular course of action
Assurance	Take assurance that effective systems of control are in place
Discussion	Receive and discuss in depth, noting implications for the Trust; no approval requested
Information	Note the report without discussion

Trust Strategic Goals This Report Supports *(Tick all that apply)*

Safe, effective, high-quality care and experience for everyone	☑
People are skilled, supported, and empowered	☑
Equity, sustainability, and good health	☐

Risk(s) Identified (Link to Board Assurance Framework)	
Risk ID	**Risk Description**
SR016	Failure to develop a culture of improvement will prevent the delivery of increased productivity and high levels of staff engagement that underpin delivery of the strategic plan.
SR022	A failure to maintain effective staff engagement whilst implementing structural change could lead to increased levels of staff sickness, grievance and reduced productivity resulting in the additional reliance on agency and bank staff usage.

Equality and Diversity Implications

Age	Gender	Ethnicity	Disability	Pregnancy/ Maternity	Marriage/ Civil Partnership	Religion/ Belief	Sexual Orientation	Gender Reassignment
☑	☑	☑	☑	☑	☑	☑	☑	☑

This report may be subject to disclosure under the Freedom of Information Act 2000, subject to the specified exemptions.

1. Introduction

In July 2025, Dr Penny Dash's review of patient safety across the health and care system recommended that the responsibilities of the National Guardian's Office (NGO) be transferred to providers, with national-level functions incorporated into NHS England's wider staff-voice activities.

The review also emphasised that the Care Quality Commission (CQC) should evaluate whether commissioners and providers have robust Freedom to Speak Up (FTSU) arrangements, supported by appropriate skills, training and resources to enable Freedom to Speak Up Guardians to carry out their role effectively. The 10-Year Health Plan endorsed this approach and reaffirmed the strong national commitment to Freedom to Speak Up, with Guardians continuing to receive organisational support and playing a central role in building safe speaking-up cultures.

In January 2026, NHS England published draft proposals on the future of Freedom to Speak Up for consultation. The engagement period closed on 20 February 2026, and feedback from a broad range of stakeholders, including FTSU Guardians, trusts, primary care, ICBs, independent providers, commercial FTSU Guardian-service providers, trade unions and arm's-length bodies, was gathered to inform the new arrangements.

The purpose of this report is to outline the impact of the national reforms and inform the committee of the revised FTSU responsibilities.

2. Summary of changes

Section 1: Leadership of the Freedom to Speak up agenda.

Supporting local leaders, maintaining national standards and system improvement.

Guardian registry

Objective	
Make sure workers know who their Freedom to Speak Up guardians are, so they can easily access the right guardian and so local accountability is maintained.	
Current NGO Role	**The revised approach**
The NGO registers all guardians who complete foundation training and checks whether they have completed the NGO refresher training modules. The register is published on the NGO's website.	Healthcare organisations will be expected to make information about their guardian arrangements available on their websites, to support awareness of and access to their guardians and other speaking up routes.
Key Changes	
• All organisations will be required to publish on their website, information about how their FTSU Guardian can be contacted. This does not need to include the guardian's name(s). • The CQC will verify guardian arrangements in NHS trusts through their Well-led inspections. • The public-facing national register of guardians will close. • NHS England will receive the most current list of all guardians from the NGO before it closes, which will be used for stakeholder engagement and communication purposes only.	

Policy and Guidance

Objective	
Ensure clear, consistent Freedom to Speak Up standards across all healthcare organisations, with the right balance between national consistency and local flexibility. Maintain easy access to guidance, resources, and valuable legacy NGO materials.	
Current NGO Role	**The revised approach**
The NGO produces national policy and guidance documents, sometimes in conjunction with NHS England. It sets some standards for Freedom to Speak Up implementation and guardian roles and maintains an extensive library of resources and case studies.	NHS England's existing Freedom to Speak Up policy and guidance function will continue. We will develop a programme of engagement for senior leaders to reinforce and clarify expectations and understand support needs in embedding Freedom to Speak Up cultures and arrangements. NHS England will review expectations of primary care providers in 2026/27 and review and rationalise policy and guidance for all other sectors during 2027/28.
Key Changes	
• NHS England will continue to maintain and update its existing guidance documents. • The NGO's policy development responsibility will cease. • All NGO legacy documentation will be preserved through the National Archive site and links to relevant documents will be signposted from NHS England's Freedom to Speak Up webpages from 1 July 2026. • There will be more opportunity to integrate Freedom to Speak Up insights into wider staff experience and patient safety policy development. • During 2026/27, the expectations of primary care providers will be reviewed by NHS England. • During 2027/28, NHS England will review policy and guidance for all other sectors.	

Data Collection

Objective	
Improve national data collection so it is more consistent and supports system learning and improvement, reduces administrative burden, and integrates more effectively with existing NHS systems to generate meaningful insights.	
Current NGO Role	**The revised approach**
The NGO collects quantitative and qualitative Freedom to Speak Up data from all guardians every quarter and publishes the quantitative data.	NHS England will collect quantitative data from NHS trusts and ICBs through the NHS national data collection process from April 2026. Healthcare organisations, rather than guardians, will be responsible and accountable for submitting data. National data collections for primary care and independent health care service providers will be paused for 2026/27 and reviewed.
Key Changes	
• Quarterly quantitative data collections will be through NHS England's established national data process from April 2026. Initially, this will only cover NHS trusts, NHS foundation trusts and ICBs. • Organisations will submit anonymised data provided by their guardian(s). Guidance to support data submission will be provided by July 2026. • Wider access to this data will be through the Model Health System. • Primary care and independent healthcare organisations should continue to collect and analyse Freedom to Speak Up data locally.	