

By email to: [REDACTED]

Human Tissue Authority

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Email enquiries@hta.gov.uk

Date: 9 July 2021

Dear [REDACTED]

Freedom of Information request

Thank you for your request for information under the Freedom of Information Act 2000 (FOIA), which was received by the Human Tissue Authority (HTA) on 11 June 2021. Your email outlined the following request:

“I would like to request a copy of any reports on staff morale/culture/bullying and harassment you have commissioned or received over the last year. I appreciate details relating to individual experiences may need to be redacted. If any reports are still awaited, I would like to request the release of those once received”.

Response

Having reviewed our records, the HTA believe the following information falls within the scope of this request:

- Results of staff Pulse Surveys (seeking opinions on key organisational issues) undertaken over the last twelve months;
- Results of a survey into staff wellbeing presented in March 2021;
- A draft independent internal audit undertaken by the Government Internal Audit Agency into the management of staff well-being at the HTA from June 2021.
- A report exploring staff concerns completed in July 2021 (the Report)

This information is included as appendices to this letter.

Section 40 FOIA

In reviewing the information you have requested, we have noted that some of information contained within the Report is exempt by virtue of the fact that it is personal data of third parties, disclosure of which would be unfair to the individuals concerned and would constitute unlawful processing of their personal data.

Section 40(3A)(a) FOIA states that information is absolutely exempt from disclosure if its disclosure would breach any of the any of the principles relating to the processing of personal data (“the DP principles”), as set out in Article 5 of the General Data Protection Regulation (“GDPR”). Insofar as the Report contains information relating to identifiable individuals the HTA has concluded that disclosure under FOIA would breach the first DP principle.

The Report has been redacted so that it does not include:

- personal information which identifies an individual directly;
- opinions reported which could identify the person expressing those opinions;
- opinions reported about a third party which could identify the subject of those opinions.

As stated above, this information is exempt under Section 40(2), which is an absolute exemption which does not require the HTA to consider the public interest test.

Further information

If you are unhappy with the way the HTA has handled your request for information in this case, you may in the first instance ask us for an internal review by writing to us at the above postal or email address.

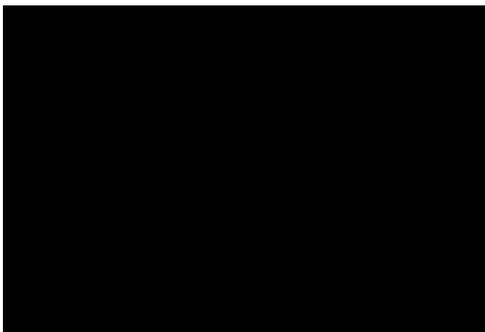
If you remain dissatisfied with the handling of your request, you have the right to appeal directly to the Information Commissioner for a decision, at the address below. There is no charge for making an appeal.

Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Telephone: 08456 30 60 60 or 01625 54 57 45

Website: www.ico.gov.uk

Yours sincerely



Pulse Survey Results

HTA Authority – 29 July 2020



Pulse Survey results – 41 responses out of 48 staff

I feel well informed about matters that affect me

84% Agree,
16% Disagree

I receive clear direction and communication from my line manager

94.5% Agree,
5.5% Disagree

I feel that the HTA leadership team has a clear plan for the next six months

81% Agree,
19% Disagree

I have a clear understanding of my work priorities for the next six months

81% Agree,
19% Strongly Disagree

I feel connected to my team and the work of the HTA

89% Agree,
11% Disagree

Pulse Survey Results

22 February 2021



Pulse Survey results – 36 responses out of 45 staff

I feel well informed about matters that affect me

64% Agree,
36% Disagree

I receive clear direction and communication from my line manager

89% Agree,
11% Disagree

I have a clear understanding of the changes that will take place in the HTA over the next six months (Verbatim comments workload and clarity)

53% Agree,
47% Disagree

I have a clear understanding of my work priorities for the next six months

72% Agree,
28% Strongly Disagree

I feel connected to my team and the work of the HTA

85% Agree,
15% Disagree

Pulse Survey Results

HTA Authority – 11 February 2021



Pulse Survey results – 36 responses out of 46 staff

Question	Response	Oct-20	Feb-21
Response rate		36/45	36/46
I feel well informed about matters that affect me	Agree	64%	72%
	Disagree	36%	28%
I receive clear direction and communication from my line manager	Agree	89%	89%
	Disagree	11%	11%
I have a clear understanding of the changes that will take place in the HTA over the next six months	Agree	53%	56%
	Disagree	47%	45%
I have a clear understanding of my work priorities for the next six months (amended to 3 months for February survey)	Agree	72%	75%
	Disagree	28%	25%
I feel connected to my team and the work of the HTA	Agree	85%	86%
	Disagree	15%	14%

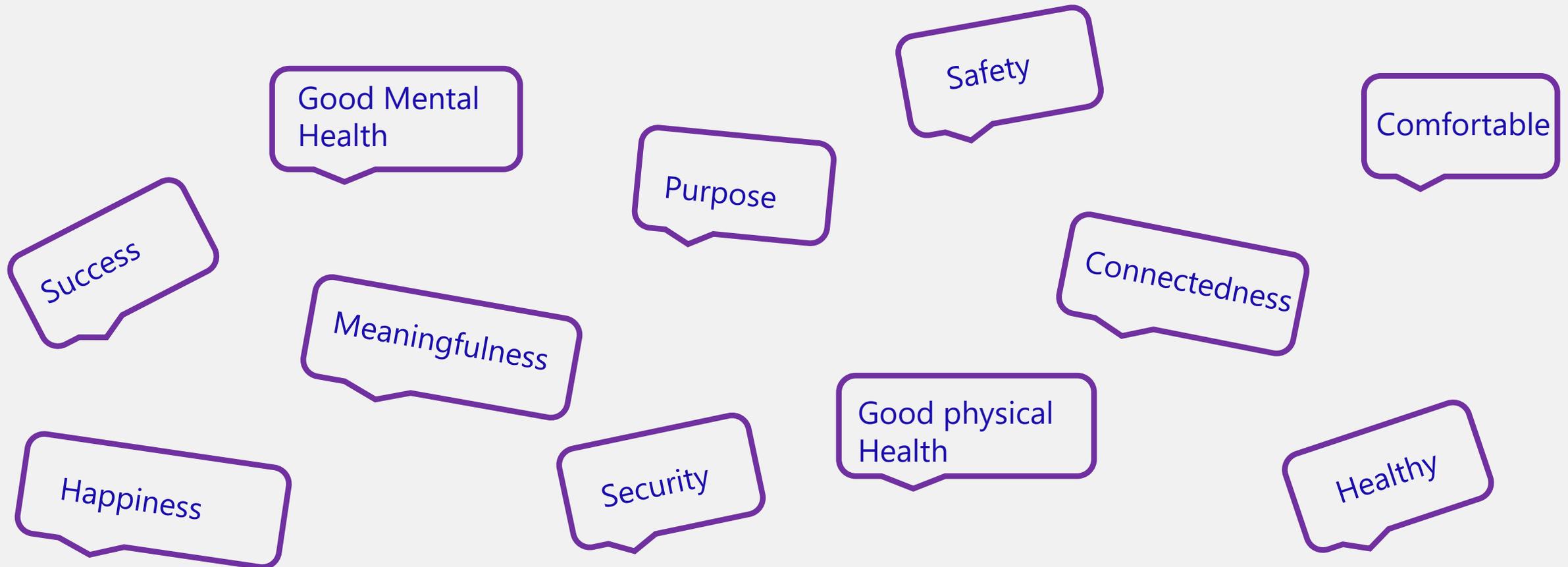
Wellbeing Survey Results

HTA 29 March 2021



What is wellbeing?

Oxford English dictionary: *'the state of feeling comfortable, healthy and happy'*



Who is responsible for Wellbeing?



Everyone in the workforce shares a responsibility for mental and physical wellbeing

Health and Safety Executive

Purpose

Understand:

- Usage - access of the HTA wellbeing pages on WAVE
- Relevance – is the material helpful, relevant to HTA staff
- What's missing – what else could we provide to support staff wellbeing

- 10 questions
- 46 invitations sent
- 34 total responses / 74% completion rate

- Average time spent on the survey – 3 minutes

Thank you to *everyone* who responded

General wellbeing assessment

88% found the wellbeing page helpful

79% rated personal wellbeing as satisfactory or above

70% said they were in control of their personal wellbeing.

79% said they felt positive in managing both physical and mental wellbeing

66% found the meeting free period helpful or very helpful

97% valued the Coffee n chat

84% said they believed wellbeing is a priority for the HTA

Q: Top 5 important factors impacting wellbeing:

lack of exercise
lack of regular sleep
work related anxiety
diet
personal / covid related stress

General sense of 'lockdown fatigue'

Self care

Using the material and links on the Wellbeing pages

Aware of personal triggers

Recognition of when need to do something different

Taking purposeful action

Controlling the controllables

Flexible working

Managing home and work life with flexibility offered

Caring responsibilities and personal resilience

Workload

Appreciation of the support offered by the HTA

Understand:

- Usage / access
- Relevance
- What's missing

Survey results:

- 88% value wellbeing pages
- 84% demonstrates priority for the HTA
- Nothing was identified

What's next?

What the HTA can do:

- If we know about it, we can help
 - Policies and procedures to support staff through difficult times
 - workload, priorities
 - work related stress or anxiety,

What the HTA cannot do:

- Take responsibility for personal challenges
- Fix things outside of our control or influence

What's next?

Maintain and build on what works well

- Wellbeing page 88%
Continue to provide 'one stop shop' for themed months, material and links to self-help groups/seminars/ toolkits etc
- Meeting free period - 12.00 – 1.00 – *does not have to be a lunch break* 66%
- Coffee 'n' chat 97%

- Social Committee 20+ different events delivered, more to come.....
- My Healthy Advantage – EAP app
- Listening to new ideas and learning from others

84% conclude wellbeing *is* a priority for the HTA



Government
Internal Audit
Agency

Human Tissue Authority

Staff Wellbeing

Draft Internal Audit Report

Date of issue: 24th June 2021

Engagement reference: 2122-HTA-001

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Executive summary

Substantial

Substantial

The framework of governance, risk management and control is adequate and effective.

Background / Introduction

The Human Tissue Authority (HTA) has an approved headcount of 51 employees and currently employs approximately 43 staff. Supporting employee wellbeing is critical in ensuring the sustained capacity of the workforce to deliver strategy and objectives. The identification and assessment of risks to employees is a key stage in developing measures that are appropriate for the organisation, compliant with policy and based on best practice guidance available.

The objective of this audit is to assess the adequacy and effectiveness of the processes in place to support employee wellbeing within HTA (in more normal times and especially during the COVID-19 pandemic).

Key findings

HTA are a small organisation which ordinarily provides a close-knit office culture, and responsive support network. Covid-19 and the move to remote working removed this environment at a time of increased challenges and risk to wellbeing.

HTA have responded well and have proactively supported their staff in a flexible and pragmatic way as follows:

- Visible senior management commitment to staff wellbeing and evidence of regular assessment of wellbeing risks;
- Wellbeing offer informed by insights from regular staff engagement activity;
- Broad range of provision incorporating practical measures, policy easements and support to enhance physical and mental health;
- Promotion of wellbeing initiatives via a range of communication channels, with extensive development of the dedicated intranet wellbeing site;
- Proactive identification of those most at risk with tailored support provided accordingly

The Stress Management and Wellbeing policies have recently been reviewed. Timely SMT sign-off is required to ensure they continue to be effective in supporting wellbeing.

HTA utilise available resources effectively and efficiently to provide an extensive wellbeing offering for an organisation of this size. We have made one recommendation and consider a **Substantial** assurance opinion is appropriate at this time.

	High	Medium	Low
Recommendation(s)	0	0	1

Findings

Assessed risk

Inadequate identification and assessment of risks to employee wellbeing, leading to inadequate plans and actions to address wellbeing risks.

Opinion on management of risk

Substantial

Findings and implications

Risks to employee wellbeing are adequately identified and assessed, with targeted support provided accordingly. Effective planning ensures timely action, visibility and buy-in at a senior level. Strategic actions to mitigate wellbeing risks are reviewed and adapted to provide a responsive approach, balancing staff wellbeing with the operating environment.

Strategy & Charter

Wellbeing is clearly defined, documented and published via the HTA People Strategy. The strategy underwent significant review in 2019, focusing on Sustainability, Resilience and Agility. An Employment Lifecycle Wheel identifies each feature of organisational life experienced whilst part of the HTA. Each category aligns with the people objectives to ensure actions taken to deliver the Strategy enhances working experience and contributes to delivery of shared goals. The wheel puts people at the core of the organisation.

The strategy is supported by a Capability Development Strategy. Whilst focusing on staff skills and recruitment, this also provides positive messaging promoting people as the most valued asset, with a clear aim to create a positive and supportive organisational culture.

Both demonstrate that HTA have given due consideration to the setting of people objectives, reflecting on value added for both employees and the organisation as a whole.

Resourcing

The Head of HR owns the wellbeing strategy, with operational delivery by the HR Manager. An anticipated reduction of the HR Manager to 0.5 FTE during 2021/22 is likely to have limited impact, due to the strong wellbeing groundwork put in place over the last twelve months. This resource level remains proportionate for the size of the organisation.

Planning for delivery and take-up of Wellbeing training and support is effective and proportionate. A strategic HR Road Map provides a six-month plan including a section specifically for Recognition and Wellbeing. At an operational level, a twelve-month 'Wellbeing Calendar' sets out monthly key themes, updated quarterly to account for current issues or 'hot topics' such as the recent Mental Health Awareness week. A more detailed quarterly HR Planning cycle sits below, ensuring mandatory training is completed annually.

Consideration is given to efficient and effective use of time, with a pro-active mix of external sources and mediums utilised to deliver support and training. The quarterly HR Planning cycle ensures undertaking training and wellbeing requirements is achievable for staff.

Risk Assessments & Action Plans

Individual risk assessments provide an effective process for formalised objective assessment of an employee's ability to carry out their role, along with consideration of adjustments and/or additional support.¹ Assessments cover a comprehensive range of circumstances including work-related stress and flexible working. Existing and proposed control measures are recorded, alongside responsible owner dates for action. Follow up is captured outlining actions taken.

New starters complete a Flexible Working assessment, however HTA recognised the increased risk posed by COVID home working. All employees undertook an assessment at the beginning of the pandemic, repeating in September 2020. A recent reminder encouraged further assessment where appropriate. In addition to functional set-up this also considers stress and caring responsibilities. HTA maintain good visibility of homeworking risks.

Individual risk assessments are supported by additional HR risk focused activities. Wider risks to wellbeing are considered, with proactive senior management engagement in managing those risks. A RAG rated plan presented to Heads of Department in May 20 outlined the approach to COVID response, balancing delivery with the need to put staff welfare at the forefront. Risks and issues were flagged, and priorities identified.

HR Operational Risk is also reported at executive governance forums such as ARAC². The March 2021 update gave a detailed overview of risks including Staff Morale and Wellbeing.

High Risk Roles

No roles currently flag as Business as Usual (BAU) 'high risk' however HTA proactively identify areas for concern.

Roles notably impacted by COVID were quickly flagged and a support plan drawn up and actioned. The flexible working policy was supplemented to reflect caring responsibilities, initially providing the option to adjust workloads without salary reduction. Re-visiting this throughout the pandemic enabled mindful balancing of staff wellbeing and HTA delivery.

Where there were significant pressures and increased workload³ additional resources were upskilled to enable rotation. Staff were closely monitored to ensure timely support. Annual leave, attrition and signs of working unreasonable hours are all kept in view as part of BAU.

Outside of COVID, additional types of support are provided where appropriate. The HTA operational business may expose staff to particularly distressing circumstances. A recent example saw HTA consult with the ambulance service to identify tailored counselling services for a specific team. This demonstrates the continual drive to protect staff wellbeing.

¹ Such as Occupational Health or specialist counselling support

² Audit and Risk Assurance Committee

³ Anticipated increase needed for large scale set up of mortuaries, body storage, and associated licenses.

Assessed risk

Ineffective engagement and communications with key stakeholders across HTA results in failure to raise awareness of employee wellbeing; ineffectively promote support available, and; low take up of initiatives.

Opinion on management of risk

Substantial

Findings and implications

There is visible senior management commitment to staff wellbeing and HTA's strategy has seen efforts from across the organisation to provide a broad range of support to colleagues. HTA have worked in a flexible and reactive way and a significant amount of new content has been sourced. This has been promoted via a range of channels to ensure that the offer has as wide a reach as possible. Mental Health First Aiders provide a vital source of immediate support for colleagues experiencing a crisis.

Promotion of wellbeing materials has been targeted via a range of communications approaches and we consider that a proportionate and varied approach has been used to optimise the reach of products and support services

Governance, Roles & Responsibilities

Accountability for Wellbeing resides with the Head of HR and delivered by the HR Manager. Ownership is clearly understood and reflected in Key Work Objectives and Personal Development Plans.

Day to day governance and oversight is provided through regular HR Manager and HR Head discussion. There is some formalised sign-off of decisions however many operational aspects such as sharing of information through the intranet site is at the HR Managers discretion. This approach is proportionate for an organisation of this size.

More formal governance is provided by the Senior Management Team⁴. Review or issue of HR policy is formally agreed through this route. Where appropriate, Heads of Department will also be engaged to provide oversight and buy-in for agreement of key operational decisions. This was evident when planning the COVID support response, including easing of the Flexible Working Policy, and risk management approach for Wellbeing Staff Support.

Clarity of wider wellbeing roles and responsibilities is evident throughout the organisation. Each policy sets out employee, Line Manager and HR responsibilities; the Mental First Aid Page sets out the role of Mental Health First Aiders (MHFA), clearly outlining expectations and MHFA capabilities. The role of the Employee Assistance Programme (EAP), Occupational Health and specialist counselling services are set out both on the Wellbeing intranet site and in accompanying guidance. This helps direct staff to the right support and ensures all understand their responsibilities in supporting delivery of the wellbeing offering.

⁴ HTA Directors, & CEO as chair

Cultural Attitudes

The importance of Staff Wellbeing is actively promoted within the HTA and is demonstrated throughout the organisation.

Concern for staff wellbeing is apparent at meetings at all levels, discussed regularly at staff 1-2-1's, and is an agenda item at both Heads of Department and all staff weekly meetings. There is an additional quarterly all staff meeting, and newly joined Board members have taken the opportunity to join these providing visibility at a senior level. This provides opportunity for wellbeing discussions across all levels of the organisation.

Active wellbeing discussion is underpinned by a wealth of additional material and further support. This ranges from staff blogs sharing thoughts and insights (such as yoga and mindfulness) to specific wellbeing training. The creation of a dedicated Wellbeing site on the WAVE intranet highlights its importance as a standalone topic creating a prominent point of reference for key information and links. Additional support is also available through specialist sources such as the EAP; Occupational Health; and Counselling & Psychotherapy services.

Staff feedback is proactively sought and acted upon, demonstrating HTA commitment to staff wellbeing. As the pandemic hit, 1-2-1's were held with all staff to ensure swift identification of key concerns. Risks posed by COVID were acknowledged on a timely basis, with senior personnel quickly engaged to agree a plan of action to protect employees and address their concerns. This has included flexing absence and homeworking policies to accommodate the challenges faced, particularly by those balancing caring responsibilities. The flexing of policies is also supplemented with more simple but effective initiatives such as implementation of a 'No Meeting' rule between 12 and 1pm. This is a forward-thinking approach exemplifying best practice. The level of support provided has received positive feedback from employees via the Wellbeing Survey.

These various approaches to promoting and supporting staff wellbeing provide a strong cultural message that staff wellbeing matters.

Communications

The WAVE intranet site provides a key platform for strong communication through a dedicated Wellbeing area. Launched in Mar 20 this is recognised as the central reference point providing clear signposting to HR policies; training; EAP; support links; wellbeing surveys; and social initiatives. Site content is maintained by the HR Manager and is informative and easy to navigate. In addition to core information, the site is utilised to promote topical subjects and updated weekly to reflect the 'Wellbeing Calendar' agenda. There is also a discussion board for all staff to share material and feedback.

Email, weekly newsletter and team meetings provide a more direct method for highlighting key information. For example, following work assignments with increased wellbeing risk, employees are referred to additional specialist services identified specifically to provide targeted support. This approach ensures information is received on a timely basis.

Finally, where more detailed communication and/or discussion is required a presentation will be made. This provides a forum to ensure information is fully understood and questions addressed. This approach was taken to walk staff through COVID concerns, including latest Government guidelines and HTA's approach to return to work.

Assessed risk

Failure to effectively monitor the wellbeing position across the organisation and inability to react and change support and guidance for employees.

Opinion on management of risk

Substantial

Findings and implications

HTA have effectively utilised survey feedback, Management Information (MI) and other engagement activities to help shape and focus its wellbeing support. There is a continued drive to further develop this approach to ensure emerging needs are met.

The flexible and responsive approach has driven the introduction of a range of new initiatives to support working from home, and a number of policy easements to meet individual circumstances. A skillful blend of resources provides a comprehensive offering alongside training and learning materials to support.

Monitoring & Use of MI

Pulse Surveys originally issued bi-annually were run quarterly throughout the pandemic to seek employee feedback on HTA as a caring employer; visibility of leadership; management of change; and feeling connected and informed. There is a good response rate (averaging 80%) and evidence that the analysis of results is being developed over time including the recent introduction of RAG ratings and drawing out of themes for consideration. The value of increased monitoring is recognised and the next survey is due to be conducted in November 2021.

Additional surveys have been issued to focus on key areas. Including:

Wellbeing Mind & Body Survey Mar 21 which sought to understand –

- Usage – access of the HTA wellbeing pages on WAVE (88% value wellbeing pages)
- Relevance – is material helpful, relevant (84% agreed)
- What's missing – further suggestions to support wellbeing (nothing identified)

The results were shared with employees via presentation and were very positive – in particular that 84% said they believed wellbeing is a priority for the HTA; and 88% found the wellbeing page helpful. These results were used to maintain and build on what works well including the 12-1pm meeting free period; coffee & chat; and Employee Assistance Programme.

A survey has also recently been issued regarding return to the office. This is particularly key as HTA have moved premises during the pandemic, posing additional concerns for those returning after the long absence.

The benefit of feedback is recognised, and the aim to increase use of MI and statistics is reflected in the HR Manager's PDP.

Training & Guidance

HTA use an effective blend of formal training provided through official training provider 'Astute'; along with a wealth of additional material sign-posted or uploaded onto the WAVE intranet. There is a clear plan and pro-active monitoring to ensure mandatory training is undertaken by all staff and refreshed

when appropriate. This includes specific training on Stress Management, both for individuals and managers. Additional training is carefully sourced to ensure its integrity, such as Mental Health First Aid training delivered by the St John's Ambulance Service.

The breadth of optional training demonstrates the HTA commitment to supporting staff wellbeing including:

- Mental health first aid course training
- Assertiveness training
- Road to resilience
- Coping with change
- Discussing and dealing with vulnerable people
- Mental health awareness
- Mindfulness and work life balance
- Speaking with impact.

Wellbeing Policy & Procedures

The scale and scope of the organisation's wellbeing offer is a positive reflection of the commitment to wellbeing by the HR team and other colleagues across the organisation. The agile and reactive approach adopted to delivering and enhancing HTA's wellbeing offer during the pandemic is a proportionate and appropriate response for the HTA operational environment.

A specific Stress Management and Wellbeing policy is supported by a range of additional policies to enhance wellbeing. Policies are clear, comprehensive, and easily accessible for all staff. During COVID, these were supplemented with additional guidance to provide a flexed and responsive approach to the changing climate. Amendments included adapting workloads and scheduled hours, particularly for those balancing caring responsibilities. Staff were consulted, and easements adjusted at regular intervals to ensure the support remains fit-for-purpose, balancing individual needs with HTA service delivery.

Following delays due to COVID, all HR policies have now been reviewed and await SMT approval. These policies are central to the wellbeing offering. Sign-off and issue is required to make certain staff reference current policy that is fit-for-purpose. HTA should ensure the Stress Management and Wellbeing Policies achieve SMT sign-off and communicated to staff as soon as possible. See **recommendation 1**.

Annex 1: Management action plan

Recommendation(s)	Priority	Action agreed	Implementation date	Owner
1 HTA should ensure the Stress Management and Wellbeing Policies achieve SMT sign-off and communicated to staff as soon as possible	Low	Text here	Text here	Text here

Annex 2: Objective, scope and limitations

Objectives

The objective of this audit is to assess the adequacy and effectiveness of the processes in place to support employee wellbeing within HTA (in more normal times and especially during the COVID-19 pandemic).

We will provide an audit opinion on the adequacy and effectiveness of key controls and highlight areas of best practice as well as suggesting areas for improvement.

Scope and limitations

This audit will:

- Review the allocation of responsibilities for staff wellbeing, and how commitment for this is secured.
- Evaluate cultural attitudes towards staff wellbeing. This will include assessing the commitment of managers throughout the organisation to support staff wellbeing, and champion staff wellbeing at a senior level.
- Examine HTA's wellbeing strategy and charter (if applicable) and undertake a high-level assessment of the deliverability and resourcing of the associated plans and the key milestones
- Review HTA's policies and procedures relating to employee wellbeing. Including making an assessment as to whether they are comprehensive, readily accessible to staff, and have been regularly reviewed especially in light of the response to Covid19.
- Review risk assessments and action plans. We will assess the adequacy of risk assessments in place in respect of wellbeing. We will review specifically how any high-risk roles are identified, and how this is moderated across the organisation.
- Review communications to employees raising awareness of employee wellbeing, the support available and self-care advice. We will also look at any information gained from staff as part of any check in surveys enacted during the pandemic to assess whether appropriate action has been taken in response to any issues arising.
- Review training provision and guidance materials available to individuals, managers, and mental health mentors.
- Assess feedback processes and monitoring arrangements. We will examine staff wellbeing measurement, reporting and monitoring.

Distribution:

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Annex 3: Our classification systems

Substantial	<p>Substantial</p> <p>The framework of governance, risk management and control is adequate and effective.</p>
Moderate	<p>Moderate</p> <p>Some improvements are required to enhance the adequacy and effectiveness of the framework of governance, risk management and control.</p>
Limited	<p>Limited</p> <p>There are significant weaknesses in the framework of governance, risk management and control such that it could be or could become inadequate and ineffective.</p>
Unsatisfactory	<p>Unsatisfactory</p> <p>There are fundamental weaknesses in the framework of governance, risk management and control such that it is inadequate and ineffective or is likely to fail.</p>

Recommendation

Priority	Definition	Action required
High	Significant weakness in governance, risk management and control that if unresolved exposes the organisation to an unacceptable level of residual risk.	Remedial action must be taken urgently and within an agreed timescale.
Medium	Weakness in governance, risk management and control that if unresolved exposes the organisation to a high level of residual risk.	Remedial action should be taken at the earliest opportunity and within an agreed timescale.
Low	Scope for improvement in governance, risk management and control.	Remedial action should be prioritised and undertaken within an agreed timescale.



Report into exploration of staff concerns

July 2021



Report to Professor Gary Crowe on the exploration of staff concerns

Background

The COVID-19 pandemic has placed new pressures on many organisations, the HTA included. Although plans were already in train to support greater remote working, these were brought forward and our internal working practices changed almost overnight.

This change, alongside the need to adapt our regulatory approach to continue to ensure public confidence and patient safety, and an ambitious programme of organisational change has inevitably put pressure on the HTA's staff.

We have always taken the health and wellbeing of our staff seriously, but in these extraordinary circumstances we have significantly increased our focus on this, making resources available to help staff to manage their health and well-being and offering one-to-one support where required.

Evidence from regular staff surveys (referred to as Pulse Surveys), from a dedicated wellbeing survey and an independent review completed by the Government Internal Audit Agency would suggest that the great majority of staff feel that they have been supported and that the HTA remains a good and supportive place to work.

However, over a relatively short space of time in early 2021 I received feedback directly from three members of staff about problems they believed to exist within the HTA's working environment impacting around half a dozen staff members. The concerns voiced were each different, but the language used was sufficiently similar that I wanted to reassure myself that there were not systemic problems with the working practices or culture within the organisation.

In consultation with the HTA Chair and with you, as chair of the Audit and Risk Assurance Committee, I decided that these concerns should be explored by someone independent of the Executive.

This work was undertaken by an external contractor (Croner Face2Face) under my direction and sponsored by you as the senior independent director of the HTA Board and the Board-level Freedom to Speak Up Champion. This was to ensure that the exploration was pursued appropriately and had oversight independent of the HTA Executive.

The language of exploration was chosen very specifically to reflect the fact that this was being entered into in the spirit of understanding and improving the HTA working environment. This was not a wholesale review of the working culture of the HTA.

The report from Croner Face2Face is attached as an appendix to this report.

Management response

Having reflected on the content of the Croner Face2Face report and its recommendations and with the knowledge I have of the operations of the HTA (including my own discussions with the three staff members), I am assured that the concerns voiced by a small number of staff, while of undeniable importance to them, are sufficiently different that they do not constitute a systemic problem with the culture or working practices of the HTA. This is also the conclusion of the independent report.

My headline diagnosis is that the changes to working practices and the pressures to do things differently, and at pace, has meant that we have needed to be more directive with staff than has been the case when operating in steady state prior to the pandemic. This, coupled with new ways of communicating, has contributed to differences in perspective (which would be more readily reconciled in a face-to-face setting) becoming more persistent.

I remain of the view that the HTA's values of professionalism, respect, expertise and agility remain at the heart of what we do. We may however, on occasion, have given the impression of a lack of empathy in the way messages have been communicated between colleagues.

I am also of the view that staff should be encouraged to share their concerns in a professional manner and, where appropriate, use our formal procedures to seek a remedy, where informal discussions haven't resolved them, rather than to allow any significant differences of perspective to remain unresolved.

The HTA's formal procedures are robust, transparent and ensure accountability: offering protections to those who complain and to those about whom a complaint may have been made. These procedures also protect whistleblowers.

I am proposing the following management response:

1. Responding to individual concerns

The individual staff members interviewed as part of this process each raised different concerns. The Croner Face2Face report makes recommendations at an organisational level. The individuals interviewed should be made aware that the recommendations of the exploration are being managed at an organisational level but that individual concerns that persist can be dealt with either informally or formally through the HTA Grievance Procedure. This action should also be used to establish whether there is a need for bilateral, or multilateral, mediation in specific circumstances to "clear the air" as the Croner report recommends.

This will be completed by the end of July 2021.

2. Cultural reset

A significant piece of work undertaken in late 2019 with wide staff involvement to refresh the HTA's organisational Values and the current Values statement remains relevant in guiding our behaviours. While I do not think that a fundamental review of our Values is required at this stage, I agree that there should be a "cultural reset". This would be valuable both to address the findings of this report, and because we will emerge from the restrictions associated with the pandemic, fundamentally changed as an organisation as a result of:

- The adoption of home working, which was already planned prior to the pandemic, will continue, with more staff working at home more frequently;
- The recognition that there will still be great benefit in coming together face-to-face to collaborate internally and with external stakeholders, and that the configuration of our new office space in Stratford means that we will need to use the space we have very differently in the future;
- The adoption of new working practices (in particular associated undertaking a number of our regulatory responsibilities remotely).

A project is already underway (under the leadership of the Director of Finance) to coordinate the HTA's emergence from lockdown restrictions. I propose that this piece of work more explicitly builds in a cultural dimension which looks to redouble our efforts on embedding the HTA values and restating behavioural expectations over the next twelve months.

This work is already in train and will be put into effect between now and the end of April 2022.

3. Improved communications and engagement

There is already a recognition from management that there are gaps in internal communications and engagement, especially around change.

Management will be focussing on this via the updated Communications and Stakeholder Engagement Strategy which is in production. Conversely, we need to engender amongst staff (as part of our Value of Agility) that there will be inevitable uncertainties in our plans and that not all questions can be answered as fully as people would like.

Developing our systems and process in an agile way means that we cannot know every step on the path ahead, and new collaborations and partnerships may mean that we need to seize new opportunities at pace. While we will endeavour to be "crystal-clear" in what we do and don't know, the expectations around the clarity our people want must be realistic.

Communications and Stakeholder Engagement Strategy in place by end December 2021.

4. Individual departures and exit interviews

Where possible we agree with the leaver a message about their reasons to share with all staff. Where this is not possible details are kept to a minimum for confidentiality reasons.

Exit interviews are undertaken in every instance where the leaver consents to do so. All exit interviews are reviewed regularly with key themes reported to SMT to promote reflection and learning.

No changes are proposed as a result of these recommendations.

Conclusion

The HTA has put a lot of time and resource into trying to support staff health and wellbeing and to promote a positive working environment and culture. These have always been important matters, but we have strengthened our efforts during the pandemic.

There have undeniably been pressures and tensions which would exist in any organisation, especially in a time of change. The period since the pandemic has, in my opinion, made some of these tensions harder to spot, address and solve, but we are working hard on addressing these management challenges.

There are very few issues and problems that can't be resolved by reference to our Values statement. They point to the right thing to do in most, if not all, challenging situations. If they are to be effective, everyone must commit to living by them, and hold each other to account where this isn't the case.

Although legitimate concerns have been raised, there is a lot of evidence to support the view that the HTA has a positive working culture. There is of course more that can be done. The lifting of lockdown restrictions and access to our new office space provides a great opportunity to reset the culture, centred on our Values.

This report and the resulting actions provide a chance to clear the air. It is important that we seize the opportunity to do so, resolving internal difficulties openly and swiftly to focus our energies on the task of protecting public confidence and patient safety.

Allan Marriott-Smith
Chief Executive
6 July 2021



Croner Face2Face Report



Employer Name: Human Tissue Authority
Log Number: 2104/2105/2007
Type of Meeting: Exploration of Concerns
Date of Meeting: Thursday 22nd April 2021
Date of Report: Monday 31st May 2021

REPORT

BACKGROUND

1. Author (A) was instructed to hold and conduct a meeting to investigate significant staff concerns on behalf of the Human Tissue Authority (HTA) (the employer) regarding matters involving a number of their employees.
2. The HTA regulates organisations that remove, store and use human tissue for research, medical treatment, post-mortem examination, education and training, and display in public. They also assess applications for organ and bone marrow donations from living people.
3. The following individuals form the HTA's Senior Management Team (SMT):
 - Allan Marriott-Smith, CEO
 - Richard Sydee, Director
 - Nicky Harrison, Director
 - Louise Dineley, Director
4. There are also ten heads of function, [REDACTED]
[REDACTED]
[REDACTED]
5. The employees who were interviewed as part of this exploration are:
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
6. [REDACTED]
[REDACTED]
7. There have been reports from a relatively small group of around seven staff members of dissatisfaction with the HTA. However, their specific individual concerns appear at the outset to be quite different.
8. The HTA has embarked upon a Development Programme to 'build back better' and this as well as the pandemic means that demands on staff have changed substantially. [REDACTED]
[REDACTED]
9. This exploration aims to obtain an independent view of the issues and establish any common themes so that the employer can put measures in place to improve the situation.

10. This report aims to bring together the information gathered from the meetings held with the six individuals noted above and provide recommendations to improve the working environment at the HTA.
11. As this report is written as A's assessment of the information provided, it is limited by the fact that there will be information that A is not aware of and people that A did not speak to who may also provide additional evidence. A does believe, however, that the range of interviews is wide enough to give a fair impression as to the issues of concern.
12. [REDACTED]

MEETINGS

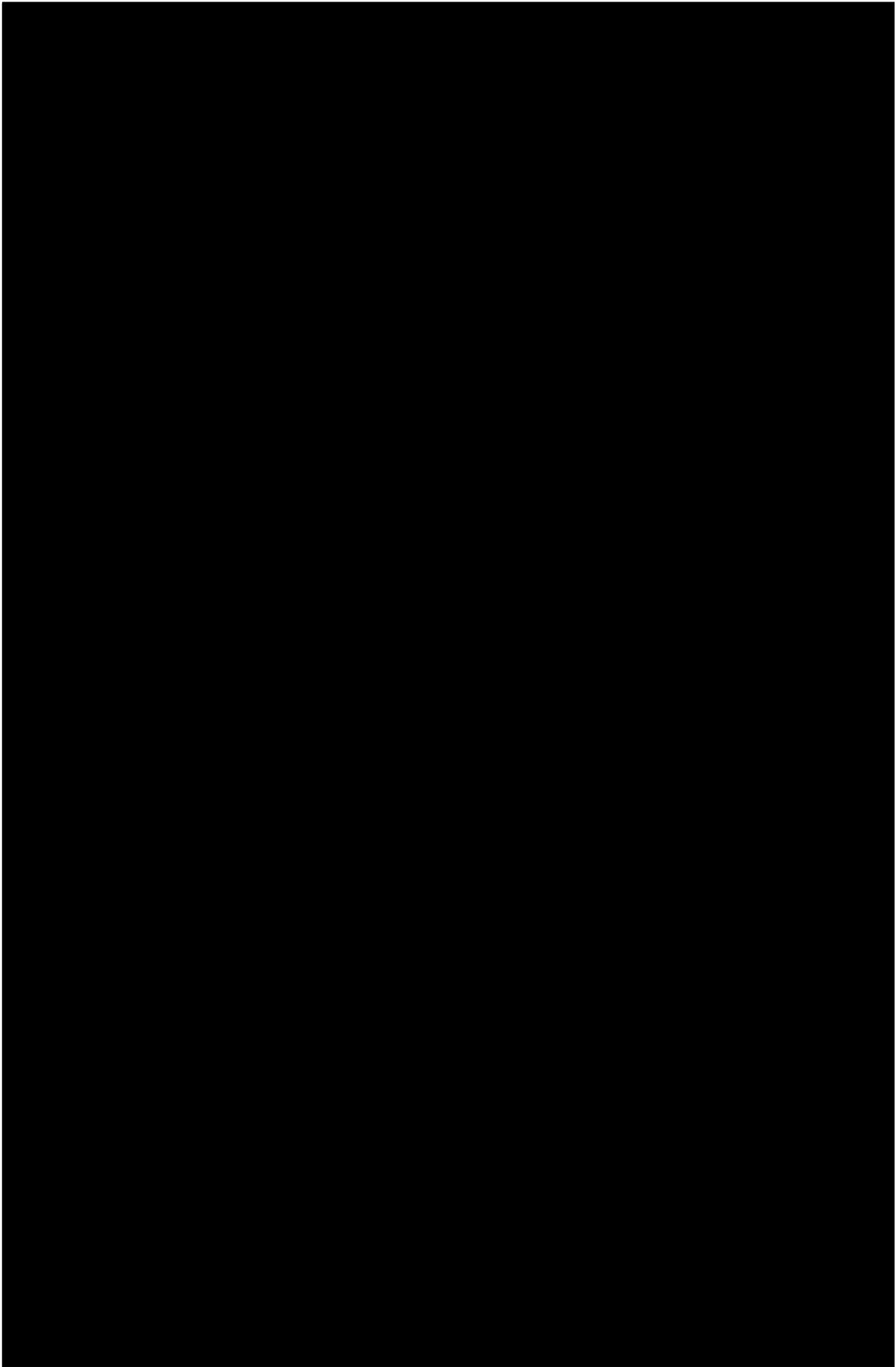
13. The exploratory meetings were conducted from Thursday 22nd April to Friday 21st May. A introduced himself as a Croner Face2Face Consultant who was there to impartially conduct this procedure.
14. A spoke to and/or gathered evidence from the six people as part of this exploration. The aim was to balance the need for a suitable level of detail and corroboration with avoiding overextending the process.
15. The meetings were audio recorded for transcription purposes to which all parties consented, [REDACTED] who did not wish to have the conversation recorded. In this instance, the meeting was conducted without a formal record as the condition [REDACTED] for it to take place.

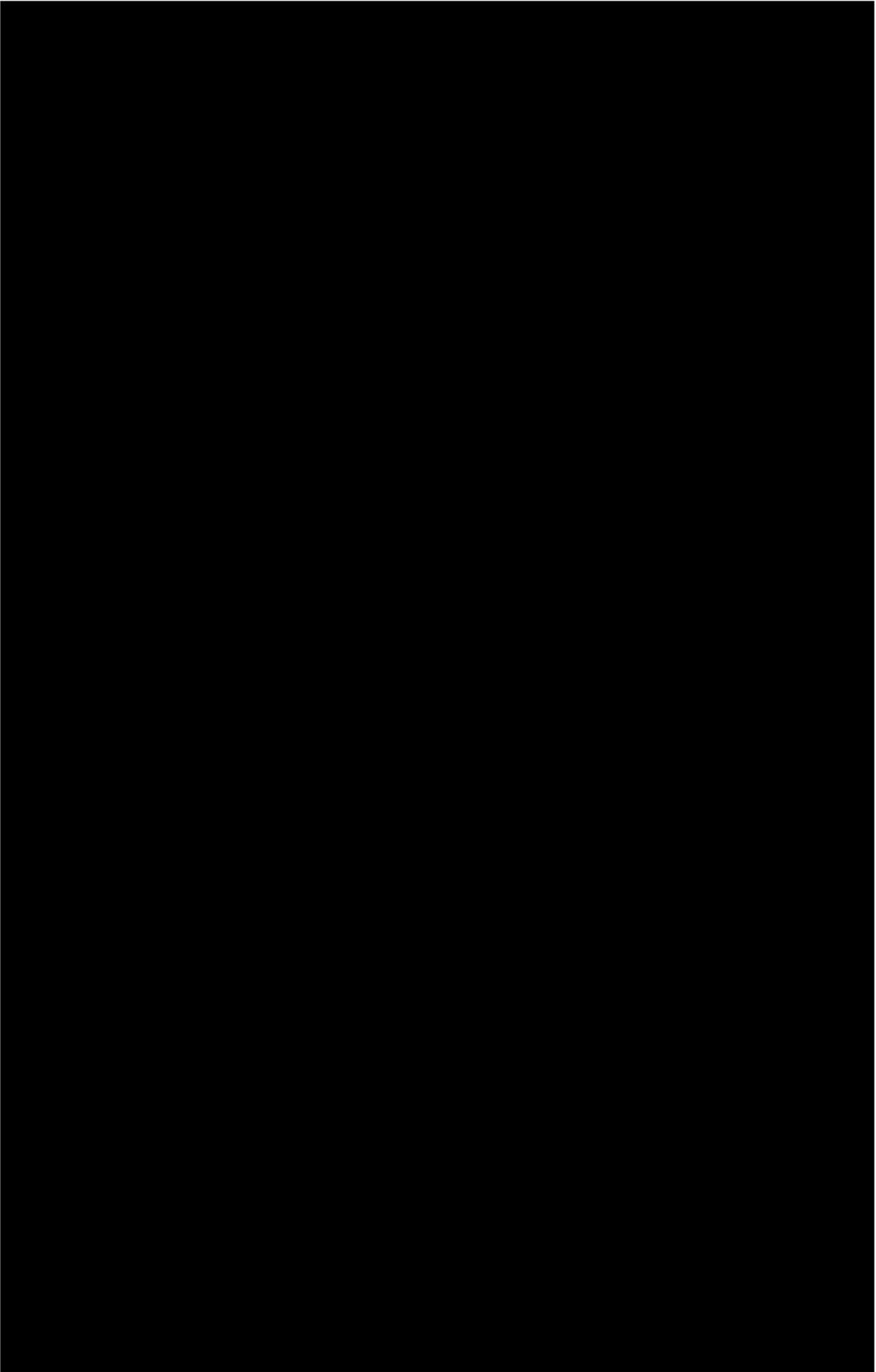
FINDINGS

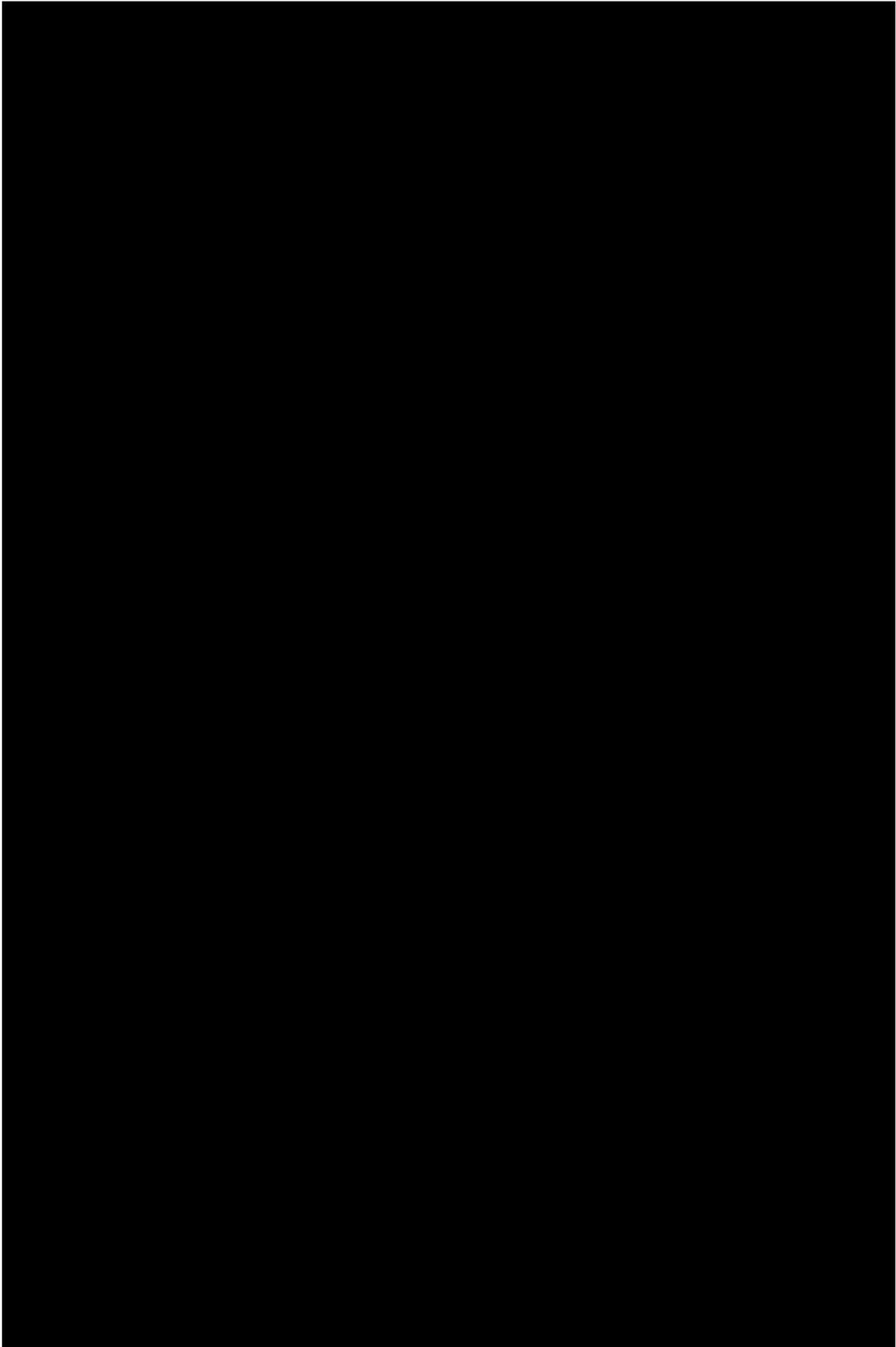
16. The role of the Croner Consultant is to provide an impartial service. We will provide a report and recommendations on the evidence put forward. It is for the employer then to decide whether or not they follow the recommendations made.
17. Whilst producing this report [REDACTED] considered the following documents:

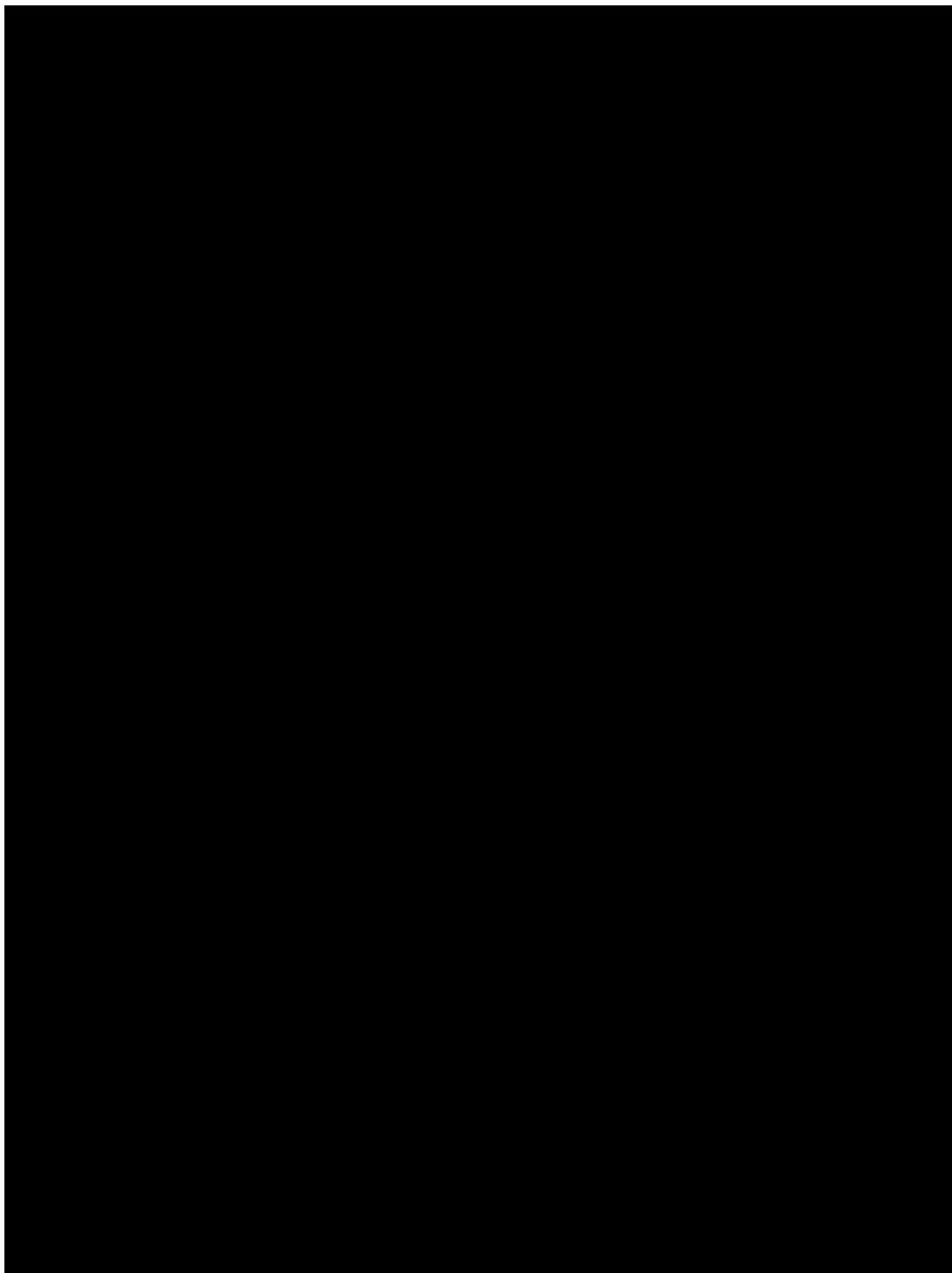
<u>Document No.</u>	<u>Document</u>	<u>Dated</u>
1.	Investigation Invite Letter	21/04/2021
2.	Exploration Summary	Undated
3.	Offer Letters/Contracts of Employment	Various dates
4.	Employee Handbook	Various dates
5.	Transcripts of Interviews with employees	Various dates

[REDACTED]









RECOMMENDATIONS

60. Having considered the content of all of the interviews carried out as part of the exploration and the themes areas that were explained, A would make a number of recommendations of actions that can be considered by the HTA.
61. A key theme is developing more constructive communications – this can take a variety of forms but the aim is for communications and relationships to be more productive.
62. To that end, the starting point could be some kind of ‘culture reset’. This may begin with an examination of the values of the organisation and considering if any kind of update is required.
63. This could take the form of gathering input from all parts of the organisation to gain buy in first, then communicating the message in a crystal-clear manner to all, via a form of training.
64. Communication of the aim and objectives of the HTA can be set out at the same time, along with expected standards of behaviour, language and interaction. An essential element is that starting from the top, i.e. the SMT – the messaging is clear and consistent.
65. Also important is making the whole process clear, in that a standard of work and behaviour is expected with clear goals for each employee against an up to date and accurate job description. Work may be required to do this; but is well worth the while as without clarity at this level, success is hard to achieve.
66. Given the strained relationships at the moment, [REDACTED] mediation may be particularly valuable in improving relationships in some instances. A number of individuals spoke of ‘clearing the air’.
67. With the current situation in mind, further along the line, the HTA may consider a form of team building, to maintain and improve working relationships. Training in communication skills for managers may also be a consideration if it is the message getting lost that is significant as opposed to wilful misunderstanding.
68. There is a more functional angle of actions that may also assist. For instance, the organisation may wish to examine, depending on the case, if an agreed announcement is a helpful way of clarifying the circumstances around an individuals’ departure.
69. Another area along these lines is looking at how exit interviews are working and if there are any lessons to be learned from the feedback of leavers, or if it could be gathered in a more productive way.
70. While positive language and a ‘can do’ attitude to the whole exercise is paramount, staff need to be clear that poor performance will lead to action being taken. The supportive nature of this can be emphasised but the fact that it will happen needs to be recognise.
71. It is acknowledged by those to participated in this exploration that there are many positive aspects to work at the HTA. There has been around a year where friction has grown far beyond what appears to have been the case historically. The culture

up until that point means that the organisation can move on positively; but a form a 'reset' is required to ensure that happens.

72. A copy of the meeting minutes transcript from the exploratory meetings should be made available to the Employees ([REDACTED]).
73. At the time of writing this report, the employees are yet to view the transcript of the meetings. A is satisfied, however, that this is an accurate record of the meetings and refers to these whilst making his findings and recommendations.
74. It is a matter for the Employer to decide whether they wish to accept any of A's recommendations.

[REDACTED]

Croner Face2Face Consultant

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Let's talk

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