

Date 18/04/2025
Your Ref
Our Ref 9909

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Dear

FREEDOM OF INFORMATION – POLICY DEVELOPMENT

I write in response to your request for information in relation to policy development.

Question:

- Who holds health board wide responsibility for the maintenance of procedures and policies?

Answer:

Services are responsible for the development and review of their policies. The process for policy approval differs depending on the type of policy.

The Policy Approval Group (PAG) has the authority to approve all clinical and non-clinical policies on behalf of Lothian NHS Board, with the exception of:

- policy where the approval role is reserved to the NHS Lothian Board – namely the NHS Lothian Risk Management Policy and the NHS Lothian Health & Safety Policy
- Finance policies – local process in place
- Human Resources policies – HR have their own process conducted in partnership management and staff side representatives. Equally, many policies (and associated materials) are now covered by the national 'Once for Scotland Workforce Policies' workstream involving representatives from across NHSScotland.
- policy related to Ionising Radiation (Medical Exposure) Regulations (IR(ME)R) – local process in place.

All policies which are submitted to the Policy Approval Group should follow the process as set out in the 'Development Review and Approval of NHS Lothian Policy' (approved by the Corporate Management Team, April 2023).

The group has no role in the development, review or implementation of policy; however, it may offer advice and recommendations to those concerned with development, review and implementation.

Headquarters
Mainpoint
102 West Port
Edinburgh EH3 9DN

Chair Professor John Connaghan CBE
Chief Executive Professor Caroline Hiscox
Lothian NHS Board is the common name of Lothian Health Board

The Policy Approval Group also has a wider Project Board function to oversee the delivery of the approved approach to guidelines, procedures, and other materials. However, the Policy Approval Group is not responsible for approving these documents.

Support for the work of the Policy Approval Group, is provided by Policy Hub. Policy Hub's role is to support staff in the policy development, review and approval process, and to implement, monitor and review the policy framework on behalf of the Policy Approval Group. Policy Hub is also responsible for the management and development of Policy Online.

Question:

- What is their name and email address?

Answer:

A single person is not responsible – individual services lead on this.

Question:

- What digital tools does the health board use for the staff to reference these procedures and policies? - i.e. – intranet

Answer:

NHS Lothian intranet:

- HR Online hosts a number of HR related policies and their associated materials on the NHS Lothian intranet. 'Once for Scotland Workforce Policies' and their associated materials are hosted on the ['Once for Scotland Workforce Policies' internet site](#).
- Finance Online currently hosts finance related documents on the NHS Lothian intranet.
- Further procedures and guidelines not associated with a policy are held on various departmental/service intranet pages, e.g. Health & Safety, Infection Control, eHealth, and many different clinical services.
- Clinical services are increasingly using the [Right Decision Service](#) (Healthcare Improvement Scotland).
- [Policy Online](#), which hosts all current policies within the approval remit of the Policy Approval Group (approx. 100 policies) and their associated materials (600+ documents), with the exception of those which have been withheld from the public-facing site for security or safety reasons. A copy of these policies (and their associated materials) is held by Policy Hub and are available on the relevant service's pages on the NHS Lothian intranet.

Question:

- How does the health board record that staff have read and comply with the procedures and policies?

Answer:

We do not require staff to have read all HR policies and procedures. The key HR policies of Discipline, Grievance and Absence are referenced in the contract of employment and individuals sign a contract before commencing employment with NHS Lothian.

NHS Lothian has a responsibility to provide various statutory and mandatory training and to ensure that its staff attend. Statutory training is required to ensure that NHS Lothian is meeting any legislative duties. Mandatory Training is an organisational requirement to limit risk and maintain safe working practice.

All new staff are required to complete a mandatory Corporate Induction Programme, which is designed to ensure that new staff members are well-prepared and integrated into the organisation. The content from many of the organisation's key policies and procedures are contained within TURAS Learn (e-learning) modules which must be completed and passed as part of Corporate Induction Programme and Mandatory Training. The completion of these modules is recorded against the staff member's TURAS Learn profile. A further compliance reporting facility in TURAS Learn is expected to be available soon.

Following Corporate Induction, and where appropriate, new staff will receive more role-specific training through local induction. Line managers should ensure that new staff complete all required eLearning modules, attend workshops and practical sessions, and that a Certificate of Achievement (or record) is received from staff members upon completion of statutory and mandatory training.

Staff are required to continuously repeat training at prescribed intervals to ensure their knowledge and skills are up to date. Requirements, including the subject, frequency and method of core mandatory training are determined according to role.

Question:

- Which tools are used for on-boarding new staff in relation to reading procedures and policies?

Answer:

As above. There are no particular tools used but as part of the induction process, staff are advised where they can access all of the relevant HR policies.

Question:

- How do the heads of department monitor that clinical and non-clinical staff have read/understood mandatory procedural updates?

Answer:

As above. Any mandatory training/updates is now done through TURAS (previously Learnpro) and managers are able to monitor compliance for their staff.

Question:

- How many staff have accessed your NHS Intranet in the past year?

Answer:

URL Name	http://intranet.lothian.scot.nhs.uk Over All Hits	http://intranet.lothian.scot.nhs.uk
April 2024 Hits	886129	347094
April 2024 Unique Visitor	36271	25248
May Hits	875728	345097
May Unique Visitor	36503	25472
June Hits	767283	304348
June Unique Visitor	31425	22250
July Hits	813855	325144
July Unique Visitor	34867	24310
August Hits	869639	339748
August Unique Visitor	36757	25893
September Hits	818745	319528
September Unique Visitor	35082	24696
October Hits	918638	358274
October Unique Visitor	39340	28139
November Hits	845901	340907
November Unique Visitor	36931	26250
December Hits	729819	293181
December Unique Visitor	32053	22701
January Hits (2025)	857904	344796
January Unique Visitor	37496	26934
February Visitor	758673	303080
February Unique Visitor	34054	24260
March Visitor	763860	318803
March Unique Visitor	34046	24610

From January to December 2024, the Policy Online internet site attracted 47,541 visitors and 110,769 page views.

I hope the information provided helps with your request.

If you are unhappy with our response to your request, you do have the right to request us to review it. Your request should be made within 40 working days of receipt of this letter, and we will reply within 20 working days of receipt. If our decision is unchanged following a review and you remain dissatisfied with this, you then have the right to make a formal complaint to the Scottish Information Commissioner within 6 months of receipt of our review response. You can do this by using the Scottish Information Commissioner's Office online appeals service at www.itspublicknowledge.info/Appeal. If you remain dissatisfied with the Commissioner's response you then have the option to appeal to the Court of Session on a point of law.

If you require a review of our decision to be carried out, please write to the FOI Reviewer at the email address at the head of this letter. The review will be undertaken by a Reviewer who was not involved in the original decision-making process.

FOI responses (subject to redaction of personal information) may appear on NHS Lothian's Freedom of Information website at: <https://org.nhsllothian.scot/FOI/Pages/default.aspx>

Yours sincerely

ALISON MACDONALD
Executive Director, Nursing
Cc: Chief Executive