

Date 01/05/2026  
Your Ref  
Our Ref 11308

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Dear

## FREEDOM OF INFORMATION – CHAPERONE POLICY

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

Question:

1. Current chaperone policy or policies relating to the use of formal and informal chaperones

Answer:

Policy attached

Question:

2. Associated procedures and guidelines included within the policy

Answer:

There are none.

Question:

2a) Guidance on how the offer, acceptance, or refusal of a chaperone must be recorded in patient notes

Answer:

The policy states that:

- All patients must be offered a chaperone for intimate examinations or care.
- The patient's preference (acceptance or refusal) must be documented in the healthcare record.
- Where a chaperone is offered and declined, and the examination proceeds, this must be clearly recorded.
- The presence or absence of a chaperone must be documented, along with relevant explanations and consent discussions.

Question:

2b) Guidance on how the sex of the chaperone is recorded

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*

Answer:

The policy:

- Recognises that the gender of the chaperone may be relevant, particularly for patients with prior trauma or vulnerability.
- States that patients have the right to choose the gender of the chaperone, and this should be respected wherever possible.
- Does not explicitly mandate how the sex or gender of the chaperone must be recorded in the patient record, beyond documenting the presence/absence and identity of the chaperone where relevant.

Question:

3. Status of the policy (withdrawal or review)

Answer:

The policy has not been formally withdrawn, but it is out of date, having exceeded its stated review date.

Question:

3a) Most recent version

Answer:

As Attached at Q1.

Question:

3b) Date it was placed under review or withdrawn

Answer:

see response at Q3.

Question:

3c) Communications with staff –

Answer:

There has been no communications to staff specifically regarding chaperoning.

Question:

3d) Timetable for development and approval of a replacement policy

Answer:

The Chaperoning Policy has been allocated to a Policy Review Team lead by Claire Palmer – Nurse Director, Acute Services.

Question:

3e) Internal and external consultation lists

Answer:

See attached document which sets out procedure for the development, review and approval of policy which sets out the arrangements for consultation.

Question:

4. Training and competency standards for staff acting as formal chaperones

4a) Training and competency standards (if not included in the policy)

Answer:

The policy states that:

- Formal chaperones must be registered healthcare professionals or Healthcare Support Workers.
- Chaperones must be prepared and competent for the role.
- Administrative or clerical staff should not act as chaperones unless trained and deemed competent.
- Line managers and individuals are responsible for ensuring competence

No additional centrally held competency standards beyond those outlined in this policy are held.

Question:

5. Audit reports, quality assurance reviews, compliance monitoring, or management/board reports (2024 to date)

Answer:

NHS Lothian does not hold:

- Audit reports
- Quality assurance reviews
- Compliance monitoring records
- Management or Board reports

specifically relating to chaperoning for the period 2024 to date.

Question:

6. Equality Impact Assessments (EIAs)

Answer:

See document attached at 3e which sets out the requirements for EIA as part of the procedure for the development, review and approval of policy.

Question:

7. Datix reports:
- Number of Datix reports raised related to chaperoning in 2024, 2025 and 2026 Jan & Feb, by sex of patient and chaperone & definition of sex field in Datix.
  - If you record this data by gender, please disclose the Number of Datix reports raised related to chaperoning in 2024, 2025 and 2026 Jan & Feb, by gender of patient and chaperone and definition of gender field in Datix.

Answer:

There were five or fewer incidents recorded. Due to the small number involved it is not possible to provide any further details.

To protect the identity of the individuals involved any figure of 5 or less has not been shown in the table above. Since we do not have their consent to release this data from their records, the information is exempt under section 38(1)(b) of the Freedom of Information (Scotland) Act i.e. to provide it would breach the Data Protection Act (2018).

Question:

8. Concerns:
- Number of concerns raised by chaperones, if not recorded via Datix, in 2024, 2025 and 2026 Jan & Feb, by sex of patient and chaperone & definition of sex field.
  - If you record this data by gender, please disclose the number of concerns raised by chaperones in 2024, 2025 and 2026 Jan & Feb, by gender of patient and chaperone and definition of gender field.

Answer:

The Patient Experience Team (PET) manages feedback, concerns and complaints raised by patients, relatives and carers. We do not record or manage concerns raised by staff, including chaperones. Therefore, this information is not held within the Datix Complaints Module.

Question:

9. Complaints:
- Number of complaints raised related to chaperoning in 2024, 2025 and 2026 Jan & Feb, by sex of patient and chaperone & definition of sex field in your complaints system.
  - If you record this data by gender, please disclose the number of complaints raised related to chaperoning in 2024, 2025 and 2026 Jan & Feb, by gender of patient and chaperone and definition of gender field in your complaints system.
  - Number of Freedom to Speak Up reports related to chaperones in 2024, 2025 and 2026 Jan & Feb by sex of the reporter.
  - If you record this data by gender, please disclose the number of cFTSU reports related to chaperoning in 2024, 2025 and 2026 Jan & Feb, by gender of the reporter.

Answer:

There were five or fewer complaints recorded. Due to the small number involved it is not possible to provide any further details.

NHS Lothian does not record demographic information, including sex or gender, in a structured format within the Datix Complaints Module that would allow reporting specific to chaperoning. Therefore, we are unable to provide a breakdown by sex or gender as requested.

The Patient Experience Team does not hold information relating to Freedom to Speak Up (FTSU) reporting.

To protect the identity of the individuals involved any figure of 5 or less has not been shown in the table above. Since we do not have their consent to release this data from their records, the information is exempt under section 38(1)(b) of the Freedom of Information (Scotland) Act i.e. to provide it would breach the Data Protection Act (2018).

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](http://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.nhslothian.scot/FOI/Pages/default.aspx>

Yours sincerely

**ALISON MACDONALD**  
**Executive Director, Nursing**  
Cc: Chief Executive