Item	Review of Policy approval process
Committee	Board of Management
Date paper prepared	23/01/2025
Date of committee meeting	26/03/2025
Subject	Policy approval process
Author	Choose an item. Sophie Dunnett, Compliance and Information Governance Manager
Action requested	☐ For Information ☐ For Discussion ☐ For recommendation ☐ For Endorsement ☒ For Approval
Purpose of the paper	Seeking approval of a revised Policy approval process for UHI NWH
Brief summary of the paper	We have a significant number of Policies which require approval so that UHI NWH are compliant. The following provides a measured approach to allow us to confirm approval at a level appropriate to the degree of alterations to each policy.
Consultation **How has consultation with partners been conducted?**	This proposal has been considered by ELT 26.11.24, and A&RM Committee 26.02.25
Resource implications **What are the risks with this proposal?**	All resources are currently in place and this process will reduce the load on Committees and Boards. The risk may be perceived by Committees and Boards as not having full control over all approvals. This is mitigated through a robust rag ratting process which will be solely controlled by the Compliance and Information Governance Manager.
Risk implications	The risk is that if the current process continues, and we will have significant delays in the approval of Policies and Procedures leading to us being non-compliant and operating without having approved guidance in place for staff and students. Without a more measured process, there would be a risk of UHI NWH not carrying out our legal, financial and audit duties in respect of all UHI / UHI NWH Policies and Procedures

Item	Review of Policy approval process
Link with strategy	N/A
Equality, Diversity and Inclusion	This approval process is fully compliant with our Equality, Diversity and Inclusion Policy and will allow us to approve Policies and Procedures which work to protect our students within all protected characteristics
Island Community Impact	It has been assessed that this approval process will have no direct equalities impact.
Paper status	Highlight the paper status in the list below: ☐**Open** – the paper may be circulated to non-members of the committee and published online without restriction. ☒**Restricted** – the paper must not be circulated to non-members or published online until after the committee meeting. ☐**Confidential** - the paper must not be circulated beyond the committee members and should not be published online. [Please note papers may still be subject to Freedom of Information requests, as specified in the next section].
Freedom of information (FOI)	Highlight the FOI status in the list below. Refer to **NWH Freedom of Information Site** for more information: ☒**Open** ☐**Closed** – disclosure would substantially prejudice a programme of research. ☐**Closed** – disclosure would substantially prejudice the effective conduct of public affairs. ☐**Closed** - Disclosure would substantially prejudice the commercial interests of any person or organisation. ☐**Closed** - Disclosure would constitute a breach of confidence actionable in court. ☐**Closed** - Disclosure would constitute a breach of the Data Protection Act. ☐**Closed** - Other, please specify.
Freedom of information (FOI) disclosure date	If closed/ withheld is selected above, enter the date when this will become 'open': Click or tap to enter a date.

These figures are current as of 18.03.25:

Policy Currency	Current	Not current	Total
No.	16	82	98

Reasons for Policies being identified as not current:

1. Policies are UHI single policies that have never been internally approved
2. Policies are out with their current review cycle
3. Policies do not represent our current working practices / legislative adherence
4. Policies have been 'lifted' from other UHI and non-UHI partners
5. Policies are marked 'Pending Board approval'

Current approval process:

Currently all Policies go through full approval within UHI NWH; SMT – Committee - Board. A recent Policy took 4 months to complete this process; this could have taken 6 months if the policy was not permitted to be considered by an alternative Board. I have been in post for 5 months and in that time we have managed to approve one policy and two procedures. Given the volume of policies and procedures to go through approval, this is not tenable.

We also within our current process do not have a robust chain of communication to record approvals and actions from meetings; one procedure was submitted for approval 24.10.24, approved 16.11.24 and I was notified upon request 09.01.25.

Revised approval process for consideration:

Departments to be supported by myself and two Engagement Assistants (Compliance Team). The Team have each been allocated a number of Departments. Those with a significant volume of work to complete will be assisted with some of the administration within the process.

Each Department has identified a Policy Owner, Review Offer (optional) and a Named Contact for the Department to assist with timely writing, reviewing and amending of all Policies and Procedures. All completed documents will be sent to compliance.nwh@uhi.ac.uk for checking by the Compliance Team and rag rating by myself.

Full templates and guidance for all documents is available on NWH Policies & Procedures - Home

Rag rating:

Approved by SMT and sent to Committee(s) for noting in monthly e-mail update to Chairs	• Policies require 'aesthetic' changes; e.g. move over to UHI NWH template, completion of front cover to represent organisational changes • Policy is a UHI single policy and requires contextualisation and internal approval
Approved by SMT and sent to Committee(s) for endorsement and Board for noting	• Policy requires minor reviewing in line with organisational changes, review of working practices, • Must not exceed two sections within a policy and changes to be clearly identified with rationale for them in the Policy submission document
Approved by SMT prior to going for full Committee(s) and Board approval	• Policy requires significant reviewing in line with organisational changes, review of working practices, compliance or regulatory requirements • Policy is new, or is operationally sensitive due to legislative, financial or audit requirements

The driver behind the suggested rag rating is to permit Committees and Boards time to review and make comment on those Policies which require that level of scrutiny. However other Policies which have had e.g. minor cosmetic changes or require internal endorsement following full UHI approval can be approved by SMT, affording the Committees and Board time to place their energies where they are most needed. All UHI single Policies will have had representation from UHI NWH involved in the approval process so will align with the needs of UHI NWH.

Policies will be moved through this process by the Compliance Team with a Policy Register used to track progress. The Register provides a single point of contact for all details in relation to the currency of our Policies, Procedures, Strategies and Guidance documents. All staff involved in progressing our compliance in this area, have access to the tracker, as well as Sharepoint, Marketing and PAs / Board Secretaries.

Policy owners and reviewers will be updated following all SMT / Committee / Board meetings of approvals / actions to be completed by myself, and updates will be provided by the Compliance Team in respect of publications of Policies.

It has been agreed by SMT that all Procedures are fully approved by SMT and do not require to go further approval.
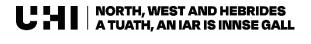
As part of the drive for transparency, a paper would be proved on a monthly basis which would detail the progress of any Policies and Procedures approved by SMT and therefore for noting by UHI NWH Committees, as well as those coming for full approval to Committees and Boards.

Please note polices which are not fully approved will no longer appear either in the internal Sharepoint or external website as they carry no legal standing and we are not covered for audit purposes.

What is needed to have confidence in UHI NWH's compliance:

Single Policy sharepoint area with all policies categorised into Department tiles with the availability of an alphabetical search function - NWH Policies - Home

Internal area behind this with restricted access for policy owners and reviewers to their policies only. This will assist with working towards a single site for the storage of all such documents. Departments requiring sight of policies within their own Sharepoint areas, will be able to do this via links back to the NWH Policy area.

Policy register - NWH Policy, procedure and guidance register.xlsx Moving forward this excel document will be embedded within Sharepoint and have automated alerts for Policy renewals

All fully approved policies which require external visibility will be made available on UHI NWH website - About us - Policies and Procedures, again categories by Departments and with an alphabetical search function

Sophie Dunnett
Compliance and Information Governance Manager