Item	Review of Policy approvals
Committee	Human Resources Committee
Date paper prepared	21/05/2025
Date of committee meeting	03/06/2025
Subject	HR Policy approval update
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	Policy tracker and HR Policies update
Brief summary of the paper	This paper provides a summary of the rag rating used within the Policy Tracker and progress required by Policy owners specifically HR to progress Policy approvals.
Consultation **How has consultation with partners been conducted?**	The Policy tracker has been widely considered by UHI NWH Senior Managers, A&RM Committee and Board of Management.
Resource implications **What are the risks with this proposal?**	The process for all Policy approvals is managed by the Compliance and Information Governance Manager with no backup outside of full support from line management, Tracy Kerr. This is a single point of failure for UHI NWH.
Risk implications	Without a more proactive engagement from Policy owners, there is a significant a risk of UHI NWH not carrying out our legal, financial and audit duties in respect of all UHI / UHI NWH Policies and Procedures. We have already had several urgent requests for Policy approval to meet audit requirements.

Item	Review of Policy approvals
Link with strategy	N/A
Equality, Diversity and Inclusion	The Policy tracker 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 the Policy tracker 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 ☐**Confidential** - the paper must not be circulated beyond the committee members and should not be published online.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.

Approval of strategic documentation

ON the 6th March, the Board of Management approved a fast-track process for the approval and publication of Policies, Procedures, Strategies, Plans and Guidance documents. This fast-track process has since then permitted me to finalise approval of and publish 27 strategic documents. For Policies alone this represents 15% of the total UHI NWH Policies which require to be approved - NWH Policy, procedure and guidance register.xlsx

As part of the fast track process, a monthly update is provided to the A&RM Committee identifying movement of strategic documents towards approval, those approved at SMT and therefore for noting at Committee / Board of Management level. The following Tracker - Approved Policies.xlsx is provided as part of this monthly update.

Rag rating of Strategic documents

A key part of the fast-track process is the rag rating of all strategic documents by the Compliance and Information Governance Manager. The rag rating denotes the agreed level of scrutiny required for all strategic documents -

Rag rating:

Approved by SMT and sent to Committee(s) for noting in monthly report	• Policies require 'cosmetic' changes; 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
Approved by SMT prior to going for full Committee(s) and Board approval	• Policy requires significant reviewing in line of organisational changes, review of working practices • 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.

It has been agreed by SMT that all Procedures are fully approved by SMT and do not require to go further approval.

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.

Priority departments

Due to my time capacity to work with Departments, I have identified the ICT and HR departments to pro-actively support them to progress approvals of their 33 Policies. With other Managers, I have asked them to work more pro-actively towards approvals of all of their strategic documents.

HR alone have 23 Policies; of those 2 have so far been approved (Equality, Diversity and Inclusivity, and Protection of Vulnerable Groups (Staff)). I have met with an identified member of the HR Team and agreed

priorities for those policies which require UHI NWH contextualisation / review and can then be approved at SMT for immediate publication; 6 policies. A follow up meeting to check on progress is in diaries for 04.06.25.

Beyond that the HR department has a significant piece of work to prioritise approvals along with all other strategic and operational priorities. Our current position is a very vulnerable one, where we are enforcing practices with no approved policies and associated documents to back our decisions. In a number of areas including HR this is not a position we should be in.

We are coming up against audit requirements where we are having to reactively meet the needs of external bodies. One we currently have within HR is an EV requirement from Lantra, our awarding body for Vet Nursing. Our lack of being able to evidence 'Conflict of Interest' within any of our approved HR policies has led to an action being placed on us by 30th June. Non-compliance will result in a potential hold being placed on our award approval and a further fine (we have already been charged for additional audit visits - £570).

The fast-track process provides support in moving completed policies through the approval process but the drive for approvals has to come from the Policy owners which in most cases are the department Managers.

Sophie Dunnett
Compliance and Information Governance Manager