



GIG
CYMRU
NHS
WALES

Bwrdd Iechyd Prifysgol
Cwm Taf Morgannwg
University Health Board



Freedom of Information Request: Our Reference CTMUHB_182_26

You asked:

Please provide the following information on NHS chaperone policies, training and reporting:

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

Please see attachment 1.

2) Associated procedures & guidelines including:

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

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

Attached in section 1 is the CTMUHB policy in respect of Personal Care and Intimate Examination Chaperone policy. This provides guidance and expectations of staff in respect of consent and documenting actions taken when a patient declines a chaperone. Whilst the policy states 'record details of the examination, including offer and presence of chaperone', it does not specify to detail the sex of the chaperone.

3) If your policy/procedures/guidelines have been withdrawn, please provide:

a) the most recent version.

b) the date it was placed under review or withdrawn.

c) the communications with staff when it was put under review or withdrawn.

d) the timetable for development and approval of any replacement policy

e) details of internal and external consultation lists.

In light of the published North Wales Child Practice Review 'Our Bravery Brought Justice', CTMUHB are currently reviewing the policy to ensure it reflects the learning and recommendations from this review. While the review of the policy is undertaken, this current version is still in use and the expectation that staff will use it while any amendments are made.

4) If not included in the policy/procedures/guidelines, please also disclose:

a) training and competency standards for staff acting as formal chaperones.

b) training description and provision for chaperones (eg online, in person, what organisations delivers the training and outline).

Please see attachment 1.

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

There are no registered audits in relation to this topic for the time period requested.

6) Related equality impact assessments (EIAs) if separate

Please see attachment 1.

7) Datix reports:

a) 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.

b) 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.

We can confirm that the Health Board does hold some of this information. However, to release the specific detailed information in the way that you have requested would mean disclosure of low numbers.

Where numbers are low we have considered that there is the potential for the individuals to be identified from the information provided, when considered with other information that may also be in the public domain.

In our view disclosure of these low figures would breach the General Data Protection Regulation (GDPR) and Data Protection Act 2018 and its disclosure would be contrary to the data protection principles and constitute as unfair and unlawful processing in regard to Articles 5, 6, and 9 of GDPR. We are therefore withholding this detail under Section 40(2) of the Freedom of Information Act 2000. This exemption is absolute and therefore there is no requirement to apply the public interest test.

However, in order to fulfil our obligation under Section 16 of the Act to provide advice and assistance we can confirm that less than 5 Datix reports were raised relating to chaperoning in 2024, 2025 and 2026 Jan & Feb. All incidents were in relation to no chaperones being available.

8) Concerns:

a) 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.

b) 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.

In relation to concerns raised by chaperones - no data recorded

9) Complaints:

a) 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.

b) 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.

c) Number of Freedom to Speak Up reports related to chaperones in 2024, 2025 and 2026 Jan & Feb by sex of the reporter.

d) 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.

We can confirm that the Health Board does hold some of this information. However, to release the specific detailed information in the way that you have requested would mean disclosure of low numbers.

Where numbers are low we have considered that there is the potential for the individuals to be identified from the information provided, when considered with other information that may also be in the public domain.

In our view disclosure of these low figures would breach the General Data Protection Regulation (GDPR) and Data Protection Act 2018 and its disclosure would be contrary to the data protection principles and constitute as unfair and unlawful processing in regard to Articles 5, 6, and 9 of GDPR. We are therefore withholding this detail under Section 40(2) of the Freedom of Information Act 2000. This exemption is absolute and therefore there is no requirement to apply the public interest test.

However, in order to fulfil our obligation under Section 16 of the Act to provide advice and assistance we can confirm that the numbers are less than 5.