

NHSGGC Accessible Health Information Policy (Clear to All)

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1. Introduction

Accurate, effective, and accessible information is essential to delivering high-quality services and care. It is central to person-centred healthcare, helping people manage their health and wellbeing, and make fully informed decisions about their healthcare.

NHS Greater Glasgow and Clyde (NHSGGC) produces, manages, and distributes a wide range of public and patient health information. Accessibility must be built into every delivery platform, whether in print, digital, or alternative formats. The information must be inclusive and meet the diverse needs of our service users.

In this context, public and patient health information (subsequently referred to as patient health information) is defined as information that is provided to patients, carers, and families about:

- Public health issues
- Clinical conditions
- Services
- Treatments
- Procedures

2. Related Policy and Regulation

As a public authority, NHSGGC is legally required to produce information in accessible formats to promote equality and eliminate discrimination. This policy is aligned with current national health strategies and legal frameworks, ensuring NHSGGC's approach to patient and public health information is up-to-date, relevant, and integrated with wider system priorities. It should be read in conjunction with [Clear to All Accessible Information Guidance 2026 - NHSGGC](#).

Patient Rights (Scotland) Act 2011	The Patient Rights (Scotland) Act 2011 requires that we communicate with people in a way that they can understand and that healthcare staff make sure the patient has understood the information given.
The Equality Act 2010	The Equality Act 2010 provides legal protection against discrimination in the workplace and wider society. It outlines the various ways in which it is unlawful to treat someone unfairly.

Health and Social Care Act 2012	All organisations that provide NHS or adult social care have a legal duty (under section 250 of the Health and Social Care Act 2012 and supported by the Equality Act 2010 obligations) to make reasonable adjustments to improve access for disabled people.
NHS England Accessible Information Standard	The NHS England Accessible Information Standard provides a recognised framework for supporting organisations to meet duties under the Equality Act. Only the parts of the NHS Accessible Information Standard that are relevant to this policy apply. This includes ensuring patient information is accessible where reasonably practicable, in line with legal duties and NHSGGC guidance.
The UNCRC (Incorporation) (Scotland) Act 2024	The United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024 requires that NHSGGC: • Publishes information in child-friendly/easy-read formats, including a Children’s Rights Report. • Considers different age levels when publishing information. • Provides children with accessible information on how to give feedback about services and access redress in case of issues.
Scotland’s Health and Care Reform strategies	• NHS Scotland Operational Improvement Plan • Scotland’s Population Health Framework 2025–2035 • Health and Social Care Service Renewal Framework These strategies share a commitment to inclusive, accessible, and person-centred information: • Information must be understandable and tailored to diverse needs, including those with low health literacy, digital exclusion, or language barriers. • Materials should be available in multiple formats—print, digital, video—and in easy-read and multilingual versions. • Digital tools, such as the Digital Front Door, will support access to personal health records, appointment management, and self-care, while embedding digital inclusion as a core principle. • Shared decision-making is central, ensuring people are empowered with the information they need to make informed choices about their care

Scottish Health Information Integrity Strategy	The Scottish Health Information Integrity Strategy (2025) sets out a national framework for ensuring the trustworthiness, transparency, and ethical management of health information across Scotland.
NHS Scotland Interpreting, Communication Support and Translation National Policy	The NHS Scotland Interpreting, Communication Support and Translation National Policy provides guidance on NHS Scotland's responsibilities to patients and carers who require support from interpreting or translation services.

3. Purpose of the Policy

This policy establishes a corporate framework to guide and support the development of high-quality health information. The policy requires information to be communicated effectively, in the most appropriate format (whether verbal or written) to support informed health decisions, self-management, treatment choices, and consent to treatment.

The policy enables NHSGGC to:

- Inform the public on health issues and provide public health advice.
- Involve patients and carers in decisions about their treatment.
- Prepare patients for procedures or appointments by supporting informed consent.
- Remind patients what they were told by healthcare staff.
- Ensure patient health information supports a positive patient experience.
- Provide information in the most appropriate and accessible format to meet patient needs.
- Ensure all patient health information produced is of a high standard in line with current evidence.
- Standardise the production and management of patient health information.
- Reduce inefficiency and duplication in the production of resources.
- Manage clinical and financial risks associated with patient information.

4. Scope of the Policy

This policy applies to all NHS Greater Glasgow and Clyde (NHSGGC) services and functions, including:

- Health and Social Care Partnerships
- Mental Health Services
- Acute Services
- Corporate Directorates

It governs the development, approval and dissemination of patient and public health information produced by NHSGGC.

The policy places the provision of accessible information and services at the centre of the day-to-day work of NHSGGC. Information should be provided promptly and at a level that meets individual communication needs. This includes:

- Public Health information – local and national information to enable the population to improve their health.
- Clinical patient information – supporting patients to make informed choices about healthcare and treatment options, including self-care.
- General patient information – materials to support a positive patient experience within healthcare settings.
- Specific patient information – letters or communications, clinical records, opt-in information.

Public-facing communications, such as websites and social media, are governed through separate corporate and digital governance arrangements. However, services remain responsible for ensuring that all patient-facing information meets relevant quality and accessibility standards and adheres to the NHS Scotland Interpreting, Communication Support and Translation National Policy.

This governance structure ensures clarity of responsibility while maintaining compliance with equality and accessibility standards across all communication channels.

5. Key Principles

The provision of patient health information should build on the interaction between health professionals and patients. It should also reflect a wider consideration of health literacy issues.

- Information should enhance, not replace, face-to-face communication. It is intended to complement and reinforce verbal interactions. Verbal communication can be supported by telephone or face-to-face interpreting support when required.
- All patients should receive prompt information that enables them to make informed decisions about their treatment and care. Health professionals have a responsibility to ensure that this information is understood.

- Patient health information must be commissioned, quality assured, and approved by an appropriate clinical lead or group before publication. It should also be routinely reviewed and version controlled. The development of new information should be endorsed by senior management, considering both risk management and budget implications. Routine review and version control are the responsibility of the designated document owner, as detailed in Section 11, Roles and Responsibilities.
- The development and provision of patient health information will take into account the United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024 and the impact of trauma experiences. These issues help ensure that information is inclusive, rights-based, and sensitive to the diverse backgrounds and lived experiences of patients, carers, and families.

6. Accessible Information

Accessible information is defined as information in a format that can be read, understood, and acted upon by its target audience. It includes information produced in languages other than English, Braille, British Sign Language (BSL), audio, large print, and easy read.

Consideration of accessibility needs should be built into the development of all new patient health information, including when the information is:

- routinely provided to the whole population, and therefore those requiring accessible formats are likely to request it, e.g., complaints procedures
- supportive of proactive informed consent for a service to be delivered, e.g., immunisation or screening
- deemed core to a healthcare intervention, e.g., patient education or clinical pathway
- of direct relevance to people with a need for information in an accessible format (e.g., Learning Disability Services)

7. Digital Delivery

Digital delivery supports the provision of accessible, rights-based health information as outlined in the [NHSGGC Digital Health & Care Strategy – Digital On Demand 2023-2028](#). Where digital channels are used, they should align with recognised accessibility standards e.g., the [W3C Web Content Accessibility Guidelines \(WCAG\)](#), in line with relevant corporate and digital governance arrangements. This includes ensuring compatibility with screen readers. Digital tools are not just delivery mechanisms. They help us provide inclusive, person-centred care and help fulfil legal obligations under the Equality Act and the UNCRC (Scotland) Act 2024.

All use of Microsoft Copilot must comply with the [NHSGGC Information Security Policy 19 – Acceptable Use](#) which governs staff responsibilities, approved digital tools, and the safe handling of organisational, staff and patient data.

8. Patient Health Information Development Process

NHSGGC should only produce information when a need or gap can be demonstrated, such as:

- The information is specific to, and supports the delivery of, clinical pathways within NHSGGC.
- The information does not replicate other credible sources of information, such as NHS Inform or Public Health Scotland. Document owners are expected to check for existing credible sources before developing new information.
- The information substantially contributes to patient or public understanding of the health issue, health condition, or treatment.

Clear to All staff will review patient health information before production and publication.

9. Accessible Standards and Guidance

Health information must be written clearly and well-structured to be effective. A well-designed layout can simplify complex content, making it easier to understand and use.

All resources should align, where appropriate, with the following standards and guidance:

- All resources should comply with the [Clear to All Accessible Information Guidance 2026 - NHSGGC](#).
- The NHSGGC branding and corporate identity requirements.
- [NHS Scotland Interpreting, Communication Support and Translation National Policy](#).

- [Creating Child-Friendly versions of written documents: a guide.](#)

Additional resources to support the development of accessible information are listed in Appendix A.

External contractors commissioned to produce information within the scope of this policy are required to adhere to these standards and guidance.

10. The Clear to All Advisory Group

The Clear to All Advisory Group is a cross-system, multi-disciplinary group created to provide a unified approach to managing and producing patient health information. The group will ensure:

- All patient health information materials have a clear rationale linked to NHSGGC priorities, clinical risk management, clinical guidance, or support the implementation of the Patient Rights (Scotland) Act 2011 and the [NHSGGC Quality Strategy 2024-2029](#).
- All patient health information materials are assessed to ensure the most appropriate and effective format is used to meet patient needs.
- All patient health information materials meet the development, design, and production quality assurance requirements.
- Best practices are followed in communicating and engaging with patients.
- Design and production methodologies are cost-effective and compliant with NHSGGC SFIs.
- An information management system is maintained to optimise resource use and, quality assurance arrangements including scheduled review cycles, staff guidance, and governance oversight.
- The patient health information development process considers resource production management, emerging digital developments, national information services, and social media opportunities.
- The implementation, monitoring, and development of the Clear to All process and the Accessible Health Information Policy.

11. Roles and Responsibilities

Responsibility for patient health information is in line with existing organisational governance arrangements:

Governance	
Director of Public Health	The Director of Public Health is responsible for providing public health information through the Public Health Information Management function and ensuring the delivery of accessible information as part of the Board's equality scheme (Equalities Strategy: A Fairer NHS GGC; 2020-2024) and the work of the Equalities and Human Rights Team.
Board Medical Director and Nursing Director	The Medical Director and Nursing Director are responsible for ensuring clinical governance arrangements are in place across NHS GGC. This responsibility includes ensuring all clinical and care-related information is developed in line with appropriate clinical guidelines and standards, is evidence-based, reinforces clinical practice alongside face-to-face communication, and promotes a positive care experience.
Chief Operating Officers and Corporate Directors (Acute Services; Health and Social Care Partnerships and Corporate Functions)	The Chief Operating Officers and Directors are responsible for the operational leadership and management of health services within NHS GGC. Responsibility for patient health information relating to a specific service or patient experience lies with the lead for the relevant service area. This policy should be implemented in line with existing operational management arrangements.
Clear to All Advisory Group	The Clear to All Advisory Group is responsible for reviewing the Accessible Health Information Policy and the patient health information produced by NHS GGC.

Leadership	
Service Lead	A defined Budget Holder who provides authorisation for the production of health information, ensures local project management controls are in place, and confirms that the resource production pathway outlined in the appendix has been followed.
Document Owner	A Document Owner leads the production of health information and is responsible for completing the information planner or amendment planner, following the Clear to All process, before

	submission to Medical Illustration Services. Document owners (or subsequent post holders) will maintain responsibility for review requirements every 3 years or as required.
Clinical Sign-off	Patient information that requires a patient to sign for Consent to Treatment must be approved by Clinical Governance. Clinical sign-off should be obtained from the relevant strand of Clinical Governance (e.g., speciality, sector, directorate, acute, primary care, or mental health), as appropriate to the content and intended audience.

12. Provision of Health Information to Patients, Public, and Staff

All staff, regardless of location, grade or profession, have a responsibility to ensure that patients and carers are informed and supported in making decisions about their care, treatment, and health and wellbeing by:

- Providing health information that complements face-to-face clinical interactions.
- Determining when an accessible format is required and making the necessary effort to provide this by following Clear to All guidance.

13. Impact Assessment

This policy was first equality impact assessed in January 2021. A refreshed Equality Impact Assessment was completed in January 2026, confirming that the policy continues to have a positive impact across protected characteristics through its commitment to accessible, inclusive patient and public health information and alignment with the UNCRC (Incorporation) (Scotland) Act 2024.

A policy development risk assessment has been completed. The main risk identified is inconsistent implementation across services. This is mitigated through the Clear to All process, quality assurance arrangements, scheduled review cycles, staff guidance, and governance oversight.

14. Communication and Implementation

Implementation of this policy will be supported through corporate communications, updated Clear to All guidance and resources, staff awareness activities, and existing Health Literacy training programmes.

Communication activity will focus on governance responsibilities, accessible information requirements, updated development processes, and resources available to support staff. Oversight will be provided by the Clear to All Advisory Group to support consistent implementation across NHSGGC.

15. Monitoring

This policy will be subject to ongoing monitoring and evaluation to ensure continued effectiveness and compliance.

Monitoring activity will include:

- auditing the management, archiving and version control of patient health information across NHSGGC
- reviewing the Public Health Resource Directory and internal ordering systems
- monitoring print procurement processes
- auditing compliance with accessibility requirements, including the provision of information in alternative formats
- reviewing stakeholder feedback to identify opportunities for improvement.

Findings will be considered by the Clear to All Advisory Group and used to inform future policy, guidance and process development.

16. Review

A consultation exercise /review was carried out to inform the update of this policy. This policy will be reviewed every three years or upon major legislative change by the Clear to All Advisory Group, in consultation with the Corporate Management Team and stakeholders who will be identified as part of the review process.

Appendix A: Additional resources to support accessible information development

- [NHS Medical Document Readability Tool](#)
- [NHS Inform: Inclusive content](#)
- [Scottish Government Principles of Inclusive Communication: An information and self-assessment tool for public authorities](#)
- [Scotland's Inclusive Communication Hub](#)
- [Scottish Government: Taking a children's human rights approach: guidance.](#)
- [Guidance to support UNCRC incorporation](#)
- [Disability Information Scotland](#)
- [Scottish Accessible Information Forum](#)
- [Plain English Campaign guides](#)
- [Patient Information Forum](#)