

NHS Greater Glasgow and Clyde	Paper No. 25/113
Meeting:	NHSGGC Board Meeting
Meeting Date:	21 August 2025
Title:	United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Bill (UNCRC) Annual Report
Sponsoring Director:	Dr Emilia Crighton, Director of Public Health
Report Author:	Catriona Milosevic, Public Health Consultant Shona MacLeod, Public Health Service Lead

1. Purpose

The purpose of the attached paper is to:

- Provide an update on NHS Greater Glasgow and Clyde's (NHSGGC) progress towards UNCRC compliance.
- Agree proposed scope of reporting
- Present progress against the previously agreed action plan.

2. Executive Summary

The United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024 came into force in July 2024. Embedding the recognition and protection of children's rights within Scots law, the Bill legally requires public bodies (extending beyond children's services) to act in compliance with the framework and includes the right to legal challenge if children's rights are not met.

An action plan was agreed by the Board in October 2024. The action plan focuses on key areas of action, organised into four delivery work streams. This includes:

Policy: Formalise governance and cross-service partnership working to meet UNCRC; NHSGGC complaints procedure.

Capacity-building: Develop tools that support services to involve children and young people; incorporate children's rights assessments into EQIA training.

Culture: Deliver NHSGGC-wide communications plan identifying core messages for public and staff; progress work within the Public Protection Framework and Significant Adverse Event Reviews.

Empowerment: Ensure younger people are engaged as part of the Moving Forward Together stakeholder engagement work; Raise children and young people's awareness of the complaints procedure; work with third sector partners to deliver rights-based training to children and young people accessing services.

3. Recommendations

NHSGGC Board is asked to consider the following recommendations:

- Note the examples of progress to date and future actions proposed.

4. Response Required

This paper is presented for assurance.

5. Impact Assessment

The impact of this paper on NHSGGC's corporate aims, approach to equality and diversity and environmental impact are assessed as follows:

- | | |
|------------------------|------------------------|
| • Better Health | <u>Positive</u> impact |
| • Better Care | <u>Positive</u> impact |
| • Better Value | <u>Positive</u> impact |
| • Better Workplace | <u>Neutral</u> impact |
| • Equality & Diversity | <u>Positive</u> impact |
| • Environment | <u>Neutral</u> impact |

6. Engagement & Communications

The issues addressed in this paper were subject to engagement and communications activity with the following key NHSGGC stakeholders:

- Corporate Communications Team (communications and engagement teams)
- Director of Nursing

7. Governance Route

The following groups have previously considered this paper as part of its development:

- Public Health Senior Management Team
- Corporate Management Team (3 April 2025)
- Population Health and Wellbeing Committee (15 April 2025)

8. Date Prepared & Issued

Prepared on: 7 August 2025

Date issued: 13 August 2025

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1. Introduction

The purpose of this paper is to provide an update on NHS Greater Glasgow & Clyde's progress towards UNCRC compliance following the enactment of the UNCRC (Incorporation) (Scotland) Act 2024 on 16 July 2024.

2. Background

2.1 UNCRC Bill

- 2.1.1 From 16th July 2024, all Children and young people in Scotland, under the age of 18, have protected rights under The United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024.
- 2.1.2 The new legislation covers all NHS Greater Glasgow & Clyde services and decisions that have an impact on children and young people, whether directly OR indirectly.
- 2.1.3 This requires NHS Greater Glasgow & Clyde and other public bodies to take proactive steps to ensure the protection of children's rights across all services and decision-making processes.
- 2.1.4 Children and young people have the same human rights as adults, on an equal basis. Children and young people have additional rights allowing them to grow, learn, play, develop and flourish. The UNCRC sets out specific human rights for children. Adoption of UNCRC recognises that children and young people face unique barriers to realising their rights due to action required by adults or their

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voices going unheard. There are 42 articles within the UNCRC covering all aspects of a child's life. 4 of these articles are known as the "General Principles" and are helpful to consider when identifying key areas of actions required within NHS services;

- Non-discrimination (Article 2)
- Best interest of the child (Article 3)
- Right to life, survival and development (Article 6)
- Right to be heard (Article 12)

2.1.5 A 'Getting Ready for UNCRC Incorporation Framework' summarised the UNCRC delivery requirements to embed children's rights into 11 key aspects of work:



2.1.5 There is an obligation towards "progressive realisation" of children's rights within available resources. As such ongoing work will be required in NHS GG&C to embed children's human rights including the right to be treated fairly, to be heard and to be as healthy as possible.

2.1.6 NHS Boards are required to submit reports on children's rights progress to the Scottish Government for review. The first report is due in 2026. These reports are significant as they ensure greater oversight and accountability, demonstrating ongoing efforts and progress made in aligning with the UNCRC provisions to protect children's rights.

2.1.7 Most HSCP areas have previously reported on actions taken towards implementing UNCRC under the requirements of the Children and Young People (Scotland) Act 2014 in partnership with Local Authorities.

3. Progress

Following the approval of the action plan, we have made significant strides towards achieving full compliance with the requirements. This ongoing work underscores our dedication to embedding children's rights within NHSGGC.

Article	Existing Good Practice	2024-25 Achievements
Leadership and Corporate Commitment & Accountability and Reporting	<ul style="list-style-type: none"> Established Rights of the Child (ROC) Group. The Board Nurse Director serves as the Executive Lead for Child Protection. NHSGGC Public Protection Strategy for 2023-2026 emphasizes child protection as a key priority. Actions to address child poverty are reported through yearly Local Child Poverty Action Reports (LCPARs). 	<ul style="list-style-type: none"> High-level UNCRC action plan developed and agreed at board level. Processes for ongoing reporting established.
Participation of Children and Young (CYP) People	<ul style="list-style-type: none"> Strong emphasis on participation of children and young people within RHC patient care and activities Additional examples of project work to involve young people and amplify their voices. Examples include the Neonatal Team at RHC regular HUG (Helping Us Grow) focus group meetings with staff and parents as part of the Family Integrated Care programme and Sandyford engagement with over 300 young people (ages 13-17) to gather their views and experiences. 	<ul style="list-style-type: none"> The RHC PACE Group has become more inclusive by involving a young person and their family. The Rights of the Child (ROC) Group, in collaboration with The Children's Health Scotland Charity, reviewed and produced the 'My Health, My Rights' Charter, which outlines children's rights in hospitals. This charter was unveiled at an event at NHSGGC's Royal Hospital for Children in September 2024, brought to life by the Children's Health Scotland Health Right Defenders and young people aged 9-17 living with health conditions in Scotland. A draft GG&C Comms Plan has been produced and includes aims around encouraging active engagement.
Empowerment of Children and Young People	<ul style="list-style-type: none"> The NHSGGC Consent Policy on Healthcare Assessment, Care & Treatment (section 13) outlines children's rights. Additionally, RHC offers guidance on gaining independence and taking control of healthcare NHSGGC provides information on independent advocacy services via its website, linking to the Scottish Independent Advocacy Alliance, with Barnardo's listed for children and young people. 	<ul style="list-style-type: none"> The GG&C EQIA tool was updated to include UNCRC consideration and this new tool was piloted. 17 EQIAs were completed in 2024-2025 using the updated tool, mostly for adult services or high-level plans. For high level plans mitigations extended to commitments to detailed EQIAs which would include direct involvement of children. Feedback from Glasgow City HSCP highlighted effective use of the template for service changes that present risk of unintended impact on children and young people. EQIA training includes UNCRC.

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Article	Existing Good Practice	2024-25 Achievements
	<ul style="list-style-type: none"> The NHSGGC EQIA process includes age as a protected characteristic. 	<ul style="list-style-type: none"> The Royal Hospital for Children successfully trialled the FEA tool with positive outcomes. Evidence returned showed all practice was underpinned by a human rights approach that reflected the needs of the UNCRC General Principle. A wider programme of FEA visits have been undertaken. The PEPI team are supporting Specialist Children's Services in gaining direct feedback from young people as part of the Specialist Community Paediatric Framework review. Additionally, three staff members at the Royal Hospital for Children received awards for promoting children's rights.
Child Friendly Complaints Procedure	<ul style="list-style-type: none"> RHC ethos of participation of children and young people aims to identify and address concerns early before escalation. This has included previous trial of Care Opinion 'Bear', a tool designed to encourage children and young people to share their opinions on the healthcare they receive. Children's complaints are recorded and monitored according to the standard complaints process. 	<ul style="list-style-type: none"> The Scottish Public Services Ombudsman launched Child Friendly Complaints Handling guidance in June 2024 and training to support this was launched in January 2025. Work is underway to update the NHS GGC process, staff knowledge and Children's Rights website to bring this in line with UNCRC Standards. The draft NHS GGC Communication Plan includes aims around raising awareness and accessibility of the complaints procedure or alternative methods of resolving concerns.
Training and Awareness Raising	<ul style="list-style-type: none"> The NHSGGC Child Protection Training Framework outlines the necessary training for fulfilling child protection responsibilities. NES has recently published an introductory module on the Turas platform, accessible to NHSGGC staff. Training on the Equality Act (2010) and EQIA Lead Reviewer Training is available Person Centred Health and Care, NHSGGC Quality Strategy are relevant to UNCRC alignment 	<ul style="list-style-type: none"> NES Turas platform has launched UNCRC training resources A draft NHS GGC Communication Plan has been produced and includes aims around raising awareness of UNCRC, and driving training uptake among staff. Children's Health Scotland has engaged with the hospital community, presenting to staff and interacting with families. Mandy Meechan, Chief Nurse, delivered a presentation on children's rights Area Nursing and Midwifery Committee which led to representation of adult services on RoC group The Education Team conducted a session in the Clyde Emergency Department on what children can expect during their visit, based on HIS recommendations.

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Article	Existing Good Practice	2024-25 Achievements
		<ul style="list-style-type: none"> The Equality & Human Rights team has met with the lead for NHSGGC module development and agreed to adopt the NES module, with plans to localise it to better meet our needs
Improving Practice - Tools and Resources to Support your Work	<ul style="list-style-type: none"> The NHSGGC Policy Development Framework mandates that policies include comprehensive information about the affected patient groups and the likely impact. The EQIA process, supported by the Frontline Equality Assessment Tool (FEAT) where appropriate, ensures that staff consider service delivery and development in relation to protected characteristics, including age. 	<ul style="list-style-type: none"> Frontline Equality Assessments (FEA tool) visits as above The Equality & Human Rights team revised and delivered the Lead Reviewer Training for bespoke and scheduled sessions from August to February, training 67 Lead Reviewers during this period.
Publishing Child Friendly/ Easy Read Information	<ul style="list-style-type: none"> The Patient & Public Health Information Management Policy, established in 2021, guides the management of health information. NHSGGC's Accessible Information Policy (Clear to All) ensures a consistent and clear approach to providing accessible information, including Easy Read and Plain English formats. 	<ul style="list-style-type: none"> The Patient & Public Health Information Management Policy is currently under review and being updated to include UNCRC.
Measuring Progress	<ul style="list-style-type: none"> NHSGGC has established a robust risk management framework. This includes risks related to public protection failures concerning vulnerable children. A variety of disaggregated information about children and young people is utilised in health service planning and monitoring to ensure their needs are adequately addressed. 	<ul style="list-style-type: none"> Production of a UNCRC action plan and development of reporting against that plan. Services and outcomes for children and young people are included within the Annual Delivery Plan and monitored through assurance processes.
Children's Rights Budgeting	<ul style="list-style-type: none"> The NHSGGC Procurement Strategy 2022-2025 prioritises using its role as a procurer of goods and services to support employability and child poverty initiatives. The Public Health Strategy 2018-2028, titled "Turning the tide through prevention," 	<ul style="list-style-type: none"> NES presentations on UNCRC to Directors of Finance and Heads of Procurement Changes to the Tender Strategy Document to reflect UNCRC within procurement has been initiated.

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Article	Existing Good Practice	2024-25 Achievements
	emphasizes a commitment to reducing poverty and socio-economic inequality.	
Non Discrimination/ Rights at Risk	<ul style="list-style-type: none"> NHSGGC ensures compliance with and monitoring of the Equality Act 2010 and the Equality Act (Specific Duties) (Scotland) Regulations 2012. Face-to-face interpreting is standard practice for appointments involving children over 2 years old. The Teenage and Young Adult Cancer Service offers emotional, practical, and financial support to young people with cancer and their families. 	<ul style="list-style-type: none"> The Hospital Education Service (HES) educates children and young people at the Royal Hospital for Children and Skye House, actively gathering feedback through patient questionnaires to improve their educational experiences.

4. Next Steps

- 4.1.** Appendix 1 shows the action plan agreed by the Board in October 2024 and includes a summary of progress against this.
- 4.2.** Supporting UNCRC implementation and reporting to both the Board and Scottish Government require clarity over scope. As highlighted in 2.1.7 there is established partnership working and reporting for HSCPs within Children's Services Planning Partnerships. It is proposed that assurance reporting to the NHS GGC Board and from NHS GGC to Scottish Government is on behalf of NHS GGC Acute, Corporate and hosted HSCP services.
- 4.3.** The following key areas of work are highlighted;
- A draft NHS GG&C UNCRC Communication Plan has been produced and is out for comment. Once agreed this will be implemented. This is relevant to a number of actions including raising awareness of UNCRC and increasing training uptake. An interim Communications delivery update will be produced for September 2025.
 - Implementation of the SPSO (Scottish Public Services Ombudsman) Child Friendly Complaints Handling Process Guidance is underway and on track to have the website updated by 31st March 2025. The main Complaints Handling Procedure document will be completed by the end of April 2025.
 - The Rights of the Child (RoC) group has widened representation across Acute services and UNCRC education has been provided to senior nursing leadership team. The next step will be to support these services in developing their UNCRC actions and review in September 2025.
 - An EQIA tool which incorporates UNCRC considerations has been developed, piloted and is now in use. Finalisation of additional supporting guidance requested during the pilot phase will be complete by July 2025.
 - Innovative work within RHC to improve children's rights continues. This will include further approaches to gain timely feedback from children and young people, improving consent processes and documentation, improving outpatient and day surgery approaches towards neurodiversity and assessing how education supports and the Young Person's Family Fund (YPFF) can better reach eligible children and young people who are inpatients in non-RHC services.
- 4.4.** Implementation of UNCRC is an evolving process across Public Services in Scotland. We will remain engaged in the national network and responsive to guidance and resources. We expect the NHS GG&C action plan will continue to develop from this national learning, from needs identified locally and in response to engagement with children and young people.

5. Recommendations

The NHSGGC Board is asked to consider the following recommendations:

- Note the examples of progress to date and future actions proposed.

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Appendix

Actions (<i>compliance with framework</i>)	Status	Comments	Owner
Work stream 1: Policy – <i>policy adaptation, co-ordination, administrative integration and budgetary consideration</i> Corporate Sponsor Elaine Vanhegan			
1.1 Formalise governance and cross-service partnership working across the organisation to meet UNCRC (<i>Leadership</i>)	Progressing	Responsibilities in relationship to HSCPs to be confirmed	Elaine Vanhegan
1.2 Review and update the governance, membership, terms of reference of the Rights of the Child Group (<i>Leadership</i>)	Progressing	Representation from Partnerships and Medical Services outstanding.	Mandy Meechan
1.3 Update NHSGGC policy development framework to ensure corporate level plans make a commitment to UNCRC and involve children and young people in consultation (<i>Leadership, Improving Practice</i>)	To be progressed		Elaine Vanhegan
1.4 Identify how to embed consideration of children's rights in budget decisions and budget setting, taking into account the Scottish Government's Participation Framework Agreement (<i>Participation of Children and Young People, Children's Rights Budgeting</i>)	To be progressed		Colin Neil
1.5 Incorporate children's rights as part of planned review of Patient & Public Health Information Management Policy (<i>Child Friendly/ Easy Read Material</i>)	To be progressed	Review underway	Emilia Crighton
1.6 Implement* Child Friendly Complaints Handling Process (<i>Child Friendly Complaints Procedure</i>)	Progressing	The team is on track to complete in relation to adding the information to the website by the 31 March 2025. All staff within the Complaints Team have attended the SPSO's training regarding this process. NHSGGC Complaints Team meet all obligations around UNCRC as complaints are reviewed on a case-by-case scenario rather than a blanket approach. There is no organisational risk.	Elaine Vanhegan/ Mandy Crawford

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Actions (<i>compliance with framework</i>)	Status	Comments	Owner
Work stream 2: Capacity – <i>building cross-sector capacity and capability to integrate rights-based ways of working</i> Corporate Sponsor Emilia Crighton			
2.1 Develop strategy to ensure children and young people's participation at all levels, and in reviewing processes and practices (<i>Participation of Children and Young People</i>)	Progressing	Draft Comms Plan produced	Sandra Bustillo
2.2 Develop tools that support services to involve children and young people (<i>Participation of Children and Young People, Improving Practice</i>)	Progressing	Draft Comms Plan produced	Sandra Bustillo
2.3 Continue with inclusive engagement and EQIA approaches to identify barriers and take action to address (<i>Empowerment</i>)	Progressing	EQIA tool developed and piloted. Tool and guidance to be finalised.	Emilia Crighton
2.4 Expand UNCRC training to wider staff groups by incorporating of children's rights assessments into EQIA training (<i>Training and Awareness Raising</i>)	Progressing	Incorporated into EQIA training. Progress towards adoption of NES Equality module. Draft Comms Plan	Emilia Crighton
2.5 Raise awareness of the Clear for All process and the Public Health Information Team to support the production and distribution of information in formats for children which are age appropriate (<i>Child Friendly/ Easy Read Material</i>)	To be progressed	Initial discussions about scope of the policy. awareness raising is within the draft Comms Plan. The Clear to All Advisory Group will assess any additional impacts from meeting UNCRC in preparation.	Emilia Crighton
Work stream 3: Culture <i>changing attitudes, norms, values and everyday actions</i> Corporate Sponsor Angela Wallace			
3.1 Raise awareness of UNCRC at senior level (<i>Leadership</i>)	Progressing	Raised through Board governance. Presentation to senior nursing and engagement of wider leadership in RoC group. Draft Comms Plan produced.	Sandra Bustillo
3.2 Produce an NHSGGC-wide communications plan identifying core messages for public and staff (<i>Training and Awareness Raising</i>)	Progressing	Draft Comms Plan produced	Sandra Bustillo

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Actions (<i>compliance with framework</i>)	Status	Comments	Owner
3.3 Review how children's rights are advanced in services not specifically for children (<i>Participation of Children and Young People</i>)	Progressing	Representation on RoC group. Work plan to be developed.	Angela Wallace
3.4 Identify clinical or corporate areas where participation of children and young people requires focused improvement and target these areas. Priority services to be identified by Rights of Child Group (<i>Participation of Children and Young People</i>)	Progressing	Prioritising non-RHC hospital services (as per action 3.3) Implement targeted improvements in our approach to neurodiversity, focusing on outpatients and day.	Angela Wallace
3.5 Ensure there are protocols in place at key transition points across the range of Maternity, Neonatal, Paediatric, Health Visiting and School Health services, and between Children and Young People Services and Adult Services. Priority services to be identified by Rights of Child Group. (<i>Empowerment</i>)	Progressing	Within Public Protection Framework. Awaiting Scottish Government transition strategy. Dependency on action 3.3	Angela Wallace
3.6 Follow guidance and Clear to All process to ensure that Children's Rights Reports are child friendly (<i>Child Friendly/ Easy Read Material</i>)	To be progressed	Reporting due 2026. To aim for child friendly corporate reporting in advance of this.	Sandra Bustillo / Emilia Crighton
3.7 Progress work within the Public Protection Framework and from Significant Adverse Event Reviews (SAERS) (<i>Measuring Progress</i>)	Progressing	Public Protection Framework	Angela Wallace
3.8 Identify education gaps for children admitted to any service (<i>Non Discrimination/ Rights at Risk</i>)	Progressing	Initial scoping complete. Working with business intelligence to identify eligible children and young people outwith RHC	Angela Wallace/ ROTC
3.9* Identify gaps in the consent process, ensure consent forms are presentable and inclusive for children and young people	Progressing	To be progressed.	Mandy Meechan
Work stream 4: Empowerment <i>ensuring a system of information, advocacy, complaints, redress and effective remedy for children and young people</i> Corporate Sponsor Sandra Bustillo			
4.1 Ensure younger people are involved (as part of the stakeholder involvement work) in relation to accessing		Work undertaken to date includes the development of approaches to seeking	Sandra Bustillo

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Actions (<i>compliance with framework</i>)	Status	Comments	Owner
healthcare as part of the Moving Forward Together (MFT) Clinical and Infrastructure Strategy services (<i>Empowerment</i>)		feedback from young people with recent experience of unscheduled care at the RHC. The PEPI team will develop and identify key areas of influence for members of the public during 2025-2026. This will help ensure we can plan and deliver engagement opportunities to meaningfully involve children, young people and those who support them in developing healthcare approaches as part of the evolving MFT Strategy. A review of this in Sept 2025.	
4.2 Actively promote information on independent advocacy and rights to those children attending children's and adult services (<i>Empowerment</i>)	Progressing	Draft Comms Plan produced	Angela Wallace
4.3 Raise children and young people's awareness of the complaints procedure or alternative methods of resolving concerns including in services outwith the children's hospital (<i>Child Friendly Complaints Procedure</i>)	Progressing	Draft Comms Plan produced	Sandra Bustillo
4.4 Work with third sector partners to deliver rights-based training to children and young people, and parents/guardians*, accessing services (<i>Training and Awareness Raising</i>)	Progressing	'My Health, My Rights' charter launched *need to educate parents/guardians added following feedback.	Angela Wallace