



# Writing policies - making the right thing to do the obvious thing to do

by Joe Roberts

*Corporate policies exist in NHS trusts to ensure safe patient care and regulatory compliance. Every trust will have a vast suite of them – sometimes more than 200 – and a labour-intensive process for drafting, reviewing, approving, publishing, and auditing them. But how do we make sure that they are read and understood by the people who need to apply them?*

In our governance reviews of NHS trusts, GGI will usually review a wide range of corporate documentation, including core organisational policies. Some – usually most – of these make clear in plain English what is required and why, but too many do not. A busy manager or frontline clinician needing guidance on how to handle an urgent, unfamiliar situation safely and legally may be faced with a 50- or 60-page document.

They might also have to wade through many pages of legal definitions and the individual duties of every single postholder who might conceivably be involved in the process before the actual process is described. The text may be dense with unfamiliar jargon or unexplained acronyms.

From reviewing hundreds of policies – some good, some average, some poor – we have produced six pieces of advice for policy writers:

## 1. Focus on the patient

It is often said that ‘the patient should be at the heart of everything we do’ in the NHS, and this is as true for policy writing as for any other activity. At the very least, you should explain in the introduction to your policy how it contributes to quality patient care – and this does not just apply to clinical policies. You also need to describe, if applicable, how the patient participates in the process. Depending on the nature of the policy, it may be appropriate to consult with patients or their representatives about the content of the policy. Some trusts, particularly in the mental health sphere, have service user and carer councils made up of members who are keen to engage with issues like this.

## 2. Consider everyone’s needs and how the policy impacts them

All public sector organisations have a legal duty under the Equality Act to assess whether their policies are fair. They must make sure that they promote equality and inclusivity, and do not disadvantage people based on protected characteristics such as disability, age, gender, race or sexuality. Your organisation will normally have a standard template for an Equality Impact Analysis (EIA) that enables you to do this. This is most definitely not a ‘tick box’ exercise, and it needs to be given serious thought. Do not leave it until the end of the drafting process – instead refer to it continuously when writing your policy, as a prompt to consider how

people with different protected characteristics will be affected. Your trust will usually have a diversity and inclusion lead; you can approach them if you are unclear about the possible impact on different groups, or how to complete the EIA.

### **3. Write succinctly and clearly**

Be aware from the outset of who your audience is and write accordingly. A clinical policy might not be read only by doctors or nurses – non-clinical managers or administrators might need to refer to it too, in which case you need to explain clinical terminology or minimise its use. Regardless of who your readership is, you should use words economically – don't write 1,000 words when 100 will do. Some organisations have a panel of managers who review draft policies before they are presented for approval. These people are not necessarily experts on the subject matter of the policy and are not asked to comment on accuracy, they are merely asked whether it reads well and is readily understandable. It may be helpful for your organisation to establish such a group.

If your policy covers a very broad or complex topic, it might be difficult to prevent it from becoming very long. In these cases, you might consider writing an overarching, high-level policy addressing principles, rules and directions, and then one or more standard operating procedures that sit below the main policy and describe what staff need to do, step by step.

### **4. Summarise visually**

Even when you can't avoid writing a long description of a process, you should be able to summarise a policy in a flow chart, close to the start of the document. The reader can use this to get an overview of what needs to be done, and then refer to the specific sections of the policy where they feel that they need more detailed guidance.

Drawing a flow chart does not just benefit the reader, but the author too. If your chart has boxes everywhere and multiple arrows heading in every direction, and gives you a headache to look at, then your policy might need to be streamlined. A flow chart is not always appropriate, particularly for policies covering general principles rather than prescribed actions, but for these a short, written summary of the policy, no more than one page long, might be helpful.

### **5. Cut to the chase**

Policies often need to define the specific duties attached to different roles and outline the legislation that governs the process. But most readers don't want to know about the responsibilities of the chief executive or a board committee, nor do they want a digest of all the Acts of Parliament relevant to the topic. They want to know how the process works and what they need to do. So, it makes sense to put the section describing the process first and add the supporting information later in the document.

### **6. Take account of the changing world**

Change is a constant in the NHS, and it can render your policy obsolete – or at least leave it requiring major updates to make sense. For example, a policy on serious incidents may refer to approval of investigation reports by clinical commissioning groups, which will soon disappear into the new world of integrated care systems. When writing a policy, be mindful of changes that you can foresee, and when your policy is due to review, be sure to check whether job titles, committees, and references to other NHS bodies need to be updated to reflect organisational change.

Above all, it pays to remember that policies exist to help people do the right thing. As much as possible, we need to make the right thing to do the obvious and straightforward thing to do. We can do that by writing policies that are clear, concise and logical.