

Reference:	FOI.19949.26
Subject:	Chaperone policies, training and reporting
Date of Request:	17 March 2026

Requested:

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.
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.
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 If your policy/procedures/guidelines have been withdrawn, please provide: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 - b. the date it was placed under review or withdrawn.
 - c. the communications with staff when it was put under review or withdrawn.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.
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).
5. Audit reports, quality assurance reviews, compliance monitoring, and management and/or board reports relating to chaperoning 2024 to date.
6. Related equality impact assessments (EIAs) if separate
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.
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.
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.

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.

Response:

Hywel Dda University Health Board (UHB) is unable to provide you with the information requested for questions 7, 8 and 9, as it is estimated that the cost of answering your request would exceed the “appropriate limit” as stated in the Freedom of Information Act 2000 (Appropriate Limit and Fees) Regulations 2004. The “appropriate limit” represents the estimated cost of one person spending 18 hours (or 2½ working days) in determining whether the UHB holds the information, and locating, retrieving and extracting the information.

The UHB’s Datix Incident and Risk Reporting System does not have a code to identify incidents relating to chaperoning. To provide you with the data requested for the 2024 to 2026 calendar years, the UHB would need to undertake a manual trawl of each recorded incident, concern or complaint to identify any information that would fulfil your request, as the information requested is not easily identifiable.

The UHB can confirm that two hundred and twenty-three (223) complaints were recorded, for the period 1 January to 28 February 2026. It is estimated that a manual search of these records alone would exceed the 18 hours stipulated within the Freedom of Information Act 2000 (FoIA). Based on the number of records identified, conducting a search, taking a minimum of five (5) minutes per record, would exceed the ‘appropriate limit’, costing the UHB the following:

223 @ 5 minutes per record = 18 hours and 30 minutes
18 hours and 30 minutes @ £25 per hour = £462.50

The UHB is therefore applying an exemption under Section 12 of the Freedom of Information Act 2000 (FoIA), which provides an exemption from a public authority’s obligation to comply with a request for information where the cost of compliance is estimated to exceed the appropriate limit.

However, under Section 16 of the FoIA, we are required as a public authority, to provide advice and assistance so far as it is reasonable to individuals who have made a request under the FoIA, this can include assisting a requestor to further refine their request.

The UHB suggests that you may refine your request by reducing the timeframe requested to a one (1) month period. However, the UHB would still be required to undertake a manual trawl of all complaints recorded to identify the information required to fulfil your request, therefore, the outcome would be dependent on the number of records identified within a shorter period.

Additionally, the UHB is unable to provide you with some of the requested information as there is a potential risk of identifying individuals if this was disclosed. The UHB is withholding the personal information relating to third parties. This decision has been made as it is not within the reasonable expectations of these individuals, that their personal data would be released into the public domain by the UHB, redactions have been applied accordingly within attachments 3, 4, 5 and 6. Some

information within attachments 5 and 6 is also being withheld due to the low number of cases (7 or less).

This information is classed as personal data of a third party. Therefore, it is being withheld in accordance with the exemption set out in section 40(2) of the FoIA, by virtue of section 40(3)(a) of the FoIA, which permits a public authority to withhold personal data other than the requestor's where the disclosure would breach Data Protection principles.

This information is protected by the Data Protection Act 2018 (DPA)/UK General Data Protection Regulations (UK GDPR), as its disclosure would constitute unfair and unlawful processing and would be contrary to the principles and articles of the UK GDPR. This exemption is absolute and therefore, there is no requirement to apply the public interest test.

In reaching this decision, the DPA and UK GDPR define personal data as data that relates to a living individual who can be identified solely from that data or from that data and other information, which is in the possession of the data controller.

1. The UHB provides a copy of its Chaperone Policy at Attachment 1.
2. Please see attachment 1.
3. Not applicable.
4. Please see attachment 1.
5. The UHB has identified four (4) audit reports relating to chaperoning, during the period 1 January 2024 to 28 February 2026. Copies have been provided at the following attachments:
 - Attachment 3 - Chaperone Procedure Documentation in Digital Rectal Examination for PR Bleeding Patients in Accident and Emergency (A&E), Bronglais General Hospital (BGH), 18 February 2025
 - Attachment 4 - Chaperone Procedure Documentation in Digital Rectal Examination for PR Bleeding Patients in A&E, BGH, Second Cycle.
 - Attachment 5 - Chaperone documentation in the Surgical Department, Withybush General Hospital (WGH), 6 March 2026
 - Attachment 6 - Chaperone documentation in the Surgical Department, WGH, 6 April 2026
6. The UHB provides a copy of the Equality Impact Assessment (EqIA) for the Chaperone Policy, at Attachment 2.
7. - 9. An exemption under Section 12 of the FoIA has been applied.