

HEALTH PROTECTION SCOTLAND GUIDANCE – PROPOSED POLICY ALIGNMENT PROCESS

HPS COVID-19 Guidance

Note: Health Protection Scotland became part of Public Health Scotland on April 1 2020

Scottish Government “Policy Alignment Check” (PAC) process

V6. 4 June 2020

Process Description and definitions

The COVID-19 pandemic has required a cross Government and whole system response, with rapid policy and delivery development and implementation. A wide range of guidance has, and continues to have, a significant role to play. It is critical that guidance is both aligned to and clearly reflects Scottish Government (SG) policy. This is particularly important given the role it plays in ensuring societal compliance with the range of non-pharmaceutical measures to delay or mitigate the spread of the COVID-19 virus. The process set out here is intended to provide clarity on how confirmation will be given to HPS that guidance is aligned with and correctly interprets Government COVID-19 policy. It is therefore described as the ‘Policy Alignment Check’ (PAC) process.

The PAC process is not intended to duplicate existing HPS governance or editorial change control measures already in place or to challenge HPS professional health protection advice.

It is recognised that policy is the domain and responsibility of Scottish Government, and professional public health/ health protection guidance is the domain and responsibility of HPS. This PAC process applies to guidance related to the COVID-19 response only.

These terms are defined as follows:

Policy

For the purposes of the PAC, policy means Scottish Government positions that have been set out publicly. It is recognised that clinical and public health advice will often be developed and agreed on a 4 UK nations basis and so HPS guidance will align with that of other devolved administrations where this is the case. However, given health is devolved, it is a matter for Scottish Ministers to determine policy within Scotland. HPS should therefore ensure guidance aligns with Scottish Government policy.

Officials will direct HPS to the existing written policy to which the guidance must align. HPS guidance will not be used as a vehicle for announcing or clarifying new policy. Where there is a need to provide more clarity to allow policy to be operationalised in their guidance, HPS will make SG aware. Until SG has refined the policy in writing to ensure there is sufficient clarity about intent, the development/revision of the guidance will be postponed until that clarity can be provided.

The PAC process focuses only on aspects of any guidance document that refers to stated policy. If additions or amendments to the policy are required then the policy must be revised and the guidance will undergo further revision once this has occurred. The function of the PAC process is not to provide spelling, grammatical, stylistic or other comments which don't relate to policy nor is it intended as a means to provide alternative opinions or to alter HPS professional public health advice. Where HPS considers that comments sent back are not confined as intended, to policy alignment or interpretation, HPS guidance team will communicate this to SG liaison team.

The Scottish Government will ensure that HPS is advised as soon as possible of emerging policy developments or significant changes to existing policy where there will be a need for HPS to develop specific health protection professional guidance or adjust existing guidance.

Guidance

Covid 19 Public Health/Health Protection Guidance is defined as professional advice on relevant public health and health protection aspects of COVID-19 infection in Scotland (including surveillance, case detection, control and prevention). It addresses the key topics of COVID-19 risk assessment, risk management and risk communication and incorporates elements of both health protection and infection prevention and control advice.

Other guidance will be developed by the Scottish Government or it's agencies (e.g. sector specific guidance) which HPS will be asked to provide a public health/health protection view on. However, given this guidance will be drafted by Scottish Government, policy alignment will take place before submission to PHS for review. It will therefore not be part of this PAC process.

Application of the SG PAC process.

Given the volume of guidance developed and updated routinely and frequently by HPS, the majority of which involve only minor changes, it is not expected that every change be subject to the PAC process. Updates involving only minor changes will therefore not be submitted to the Scottish Government. The following are examples of minor changes but this list may be expanded or refined as the process evolves:

- Changes to references within documents (i.e. web links etc.)
- Updating existing HPS guidance following agreement on alignment with policy within one document to other HPS guidance documents.
- Clarifications to wording that does not affect the policy intent of Scottish Government.
- Changes in wording without new additions in terms of substantially changed clinical advice or new SG/ UK Government policy initiatives
- Unless advised by SG differently, where a new guidance document is produced as a result of an agreed UK 4 Nations policy development process, involving all four UK Nations CMOs, then it will be assumed that SG accepts this as Scottish Government Policy

HPS should keep SG informed of changes to guidance that are not being submitted to the PAC and the exemptions that are being applied.

Guidance documents will be subject to the PAC where they are produced or adapted as a result of new Scottish Government policy or as a result of a change in the policy position. In such cases, unless otherwise agreed, any new HPS guidance developed to support such new or modified SG policy will be shared with Scottish Government for completion of the PAC process.

Draft guidance will be processed through the PAC, with all changes since the last published version clearly highlighted. This also applies where a new version is submitted while an earlier version is still being processed through the PAC. In this case, highlights in the later version must include all changes made since the published version and not just those made since the last version was submitted to the Scottish Government. There should be some means of differentiating between changes made at each version (by, for example, highlighting in different colour.) If HPS are unable to highlight the text in this way, this will be done by the HPS liaison team in SG.

There may be occasions where it is not immediately clear whether a PAC will be required. In these cases, the SG HPS liaison team will work with the HPS guidance cell to maintain an awareness of changes planned to existing guidance and to consult CMO (or in his absence DCMO) for a view.

Completion of the PAC process

The focal point within Scottish Government for the oversight of this process is the HPS Liaison team within the SG Covid-19 Public Health Directorate. They will liaise with all relevant areas to provide feedback on alignment, this will predominately be via the CMO/DCMO Office.

The process is intended to improve and speed up the process of ensuring alignment of guidance with SG policy. In all cases there will be liaison across the HPS and SG teams. It is understood that a 24 hour turnaround and meeting the daily 3pm HPS deadline for web publishing would reduce delay and the risk of compromising clinical safety. Every effort will be made to achieve this. Where this is not going to be possible the SG liaison team will alert HPS and every effort will be undertaken to turn the guidance around quickly by working together. Every effort will be made by SG to ensure that there is no undue delay to a rapid PAC review and feedback, including at weekends.

The primary purpose of the process is to assure both the Scottish Government and Public Health Scotland that all HPS produced guidance is clearly policy aligned. HPS will ensure that SG policy is stated in HPS guidance documents clearly and, where possible, in such a way as to make this identifiable (e.g. by use of quotation marks and italics).

Requests made via the SG HPS Liaison team for changes to HPS guidance documents will set out which aspect of policy is relevant and specify what change is required to ensure it aligns with and correctly interprets policy. The text of the policy to which it should align must be provided. Where changes clearly relate to accurate alignment or interpretation of policy then HPS will accept and make the necessary changes. Where HPS does not agree that proposed SG changes are policy related, HPS will feed this back to SG liaison colleagues as soon as practicable.

Where there is a failure to agree on a set of requested changes then there will be further iteration initially to try to arrive at a mutually acceptable wording. If this proves impossible, the escalation is that the CMO (or their representative) and the Clinical Director of Public Health Scotland (or their representative) will work together to resolve this as quickly as possible.

On completion of the Scottish Government element of the PAC process, the SG HPS Liaison team will inform HPS via their central mailbox ([nss.hpsc冠avirus@nhs.net](mailto:nss.hpsc冠onavirus@nhs.net)) and the guidance team mailbox (phs.admin.guidancecell@nhs.net)

Where there are either no changes required or where a final set of changes have been agreed by both SG and HPS, then SG will notify HPS using the following wording:

- *The Scottish Government is satisfied that the HPS Guidance document (title) is in alignment with SG policy and can therefore be published.*

This will form part of the official record and reflects the independent professional health protection role of HPS as part of Public Health Scotland.

25th July 2020

Jointly agreed

Both the PAC and the implementation will be reviewed in a month