

Website Content and Development Policy

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Website Content and Development Policy			
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Executive Lead:	Director of Human Resources and Organisational Development		
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Dec 2021	NHS Lothian Web Services Manager	v1.0	Approved by the Policy Approval Group

Executive Summary

The primary role of NHS Lothian websites is to provide information on our services, facilities, consultations, policies, publications, careers, latest developments, general news and how to communicate with NHS Lothian.

This policy seeks to ensure all information published on NHS Lothian websites is accessible, consistent, transparent, accurate and up-to-date and that departments and/or services providing web-based information do so only through the following domain name: nhslothian.scot or via a pre-approved third party website.

All Content Editors must have read and understood this policy prior to editing their website.

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1.0 Purpose

The purpose of this policy is to ensure all information published on NHS Lothian websites is accessible, consistent, transparent, accurate and up-to-date and that departments and/or services providing web-based information do so only through the following domain name: nhslothian.scot or via a pre-approved third party website.

2.0 Policy statement

The primary role of NHS Lothian websites is to provide information on our services, facilities, consultations, policies, publications, careers, latest developments, general news and how to communicate with NHS Lothian.

The secondary role of the websites is to provide departments with the facility to publish detailed information and documents about their specific services to patients, public, other organisations, students and professionals.

3.0 Scope

This policy applies to all staff employed by NHS Lothian. It also applies to contractors, partnership organisations and visitors not employed by NHS Lothian but engaged to work with, or who are providing information to NHS Lothian's websites.

This policy also applies to other websites directly related to NHS Lothian or any website that uses the NHS Lothian logo.

This policy does not relate to the NHS Lothian intranet.

4.0 Definitions

Intranet: Local restricted access website only available to NHS Lothian staff and other organisations on the "SWAN" secure network.

SWAN: The Scottish Wide Area Network (SWAN) is the secure network for Scotland's public services.

Internet: A worldwide network that allows computers across the globe to link with one another and share information.

Content Editor: A person who updates the information on a website.

Content Management System (CMS): Computer software used to manage the creation and modification of digital content.

Web Accessibility: Web accessibility means that websites, tools, and technologies are designed and developed so that any person can use them and the information on a website is usable for all.

5.0 Implementation roles and responsibilities

5.1 Staff responsibilities

5.1.1 The Communications Department

The Communications Department is responsible for enforcing this policy through regular reviews of all website content. The Communications Department aims to ensure that corporate information is always accurate and up to date.

The Communications Department is responsible for providing and maintaining the Content Management System (CMS) and providing support and training materials to staff.

The Communications Department will:

- provide information and news to all NHS Lothian stakeholders, both internal and external, through direct provision and by supporting and liaising with all NHS Lothian departments
- provide training materials and support on the Content Management System to Content Editors
- ensure this policy is adhered to by all departments and services

The Web Team will:

- manage the software applications for NHS Lothian websites
- provide support to Content Editors

5.1.2 Directors and Heads of Departments

Directors and Heads of Departments have a duty to provide information about their services to patients and the general public.

Directors and Heads of Departments are responsible for ensuring that staff within their own directorates and departments work in a manner consistent with the principles outlined in this policy.

Directors and Heads of Departments must ensure that content owners and website editors have read and understood this policy prior to editing their website.

Directors and Heads of Departments are responsible for ensuring service information provided is accurate.

When appropriate, Directors and Heads of Departments are responsible for appointing website content owners to their website.

There are instances where information will be managed by both the Communications Department and another department. In such cases agreement will be made between the relevant staff members on how this should proceed.

5.1.3 Content Owners

It is the responsibility of the Content Owner to ensure the information pertaining to their department or service is accurate and up-to-date.

All Content Owners must have read and understood this policy prior to providing content for their website.

The Content Owner will:

- approve all information prior to publication on the website
- ensure local agreements are established, where necessary, for content approval
- ensure local editors review and update their information on a regular basis
- ensure information is presented in a clear and consistent manner.

In some cases the Content Owner will take on the role of the Content Editor.

5.1.4 Content Editors

Each Department or Service should have multiple Content Editors who have responsibility for updating the web content for their own department or service.

Content Editors must ensure that the web content meets the [international WCAG 2.1 AA accessibility standard](#).

All Content Editors must have read and understood this policy prior to editing their website.

5.1.5 All Staff

Staff should report any out of date or inaccurate information on the website to the relevant service or department lead.

5.2 Single or Stand Alone Websites

No singular websites should be developed or maintained unless prior approval has been given by the Communications Department. However, approval does not exclude a website from future integration with NHS Lothian websites. Exemptions to this have been outlined later in this policy (section 5.10).

If any Single or Stand Alone websites are in breach of this policy, a formal request will be made from the Director of Communications to the relevant Director or Site Lead to take the website off-line. Failure to do this may result in action being taken through the current Disciplinary Policy.

Single or Stand Alone website owners should provide the Communications Department with a user account for their website to allow Web Team full access to the website.

5.3 Website Content and Information

Information provided on NHS Lothian websites is primarily intended for the general public and patients. Content must be written in a clear and consistent manner. A 'Writing well for

the Web' guide is available to assist Content Editors and Owners with this. This guide can be accessed on the intranet at ['Writing Well for the Web'](#).

All content published on NHS Lothian websites must meet the [international WCAG 2.1 AA accessibility standard](#).

Secure areas are not permitted on NHS Lothian websites. However, it is permitted to allow a link to an external website with this functionality, but it must be clearly stated on the webpage that this is provided for a specific audience and state why the restriction is in place.

Information intended for staff only should be published on the Intranet. If staff members require access to the Intranet externally they should seek authorisation from the eHealth Department.

Information intended for staff to access externally can be published at [staff.nhslothian.scot](#) however any content published on this website is unsecure and can be accessed by anyone, so only non-sensitive information should be published.

5.4 Content Restrictions

No sensitive or personally-identifiable information should be uploaded to NHS Lothian websites. Uploading such information may result in action being taken through the current Disciplinary Policy.

Content or files that do not meet Accessibility standards should not be uploaded to NHS Lothian websites.

Only information relevant to specific departments or services may be uploaded. No other information, including advertising should be displayed. Personal comments, opinions or offensive material must never be uploaded.

NHS Lothian will not support, condone, or accept on its web pages the activities listed below:

- Activities which violate this and other NHS Lothian policies
- Activities which violate laws
- Activities which infringe on other's rights and freedoms
- Commercial and personal business activities.

Please note this list is not exhaustive.

5.5 Reviewing Information

It is expected that Content Owners and Editors will review and update their content on a regular basis. However, if content is not reviewed then the automatic content review system will begin and information may be removed from the website. Further Details on the Content Review System is available on the Intranet.

Communications retain the right to change, or to suggest changes, to any department or service information to ensure the information is correct, or written in the style required. In

these cases, notification will be sent to the Content Owner or Editor to request that changes to the content are made, or advise that the changes have been made already.

5.6 Failing to Comply with the Policy

Any member of staff failing to adhere to the terms laid out in this policy when putting information on NHS Lothian websites will be held accountable and it may result in action being taken through the current Disciplinary Policy.

Failing to declare the existence of an external NHS Lothian funded website (either scoping, in development or completed) will be in breach of this policy.

5.7 Copyright

Only information, photographs, illustrations and other images created by a department or service should be published on NHS Lothian websites, unless express written permission has been given by the copyright holder or author. Any correspondence relating to this must be retained by the Content Owner for proof should litigation ever occur.

If a Content Owner wishes to use content belonging to someone else, then they can link to it if it is available on another website. In most cases it is not necessary to obtain permission to do so, but it can be useful to arrange a reciprocal link back to NHS Lothian websites.

Information on our website may be used by others if deemed appropriate by the Content Owner. Written permission should be given and any correspondence retained or recorded. Before giving permission Content Owners should establish the purpose of the link. A reciprocal link may be arranged at the Content Owner's discretion.

You must obtain and record permission for the Copyright holder to use photographs, illustrations and other images.

5.8 Data Protection

Content Owners may only request personal information from users which is relevant to a specific service, or range of services for the purposes of research and evaluation, such as survey's or to add users to a contacts list. Any personal information held must comply with the principles outlined in the Data Protection Act, 1998.

Content Owners have an obligation to inform users when information about them is being captured and what it will be used for.

No patient, personal or sensitive data should be published on NHS Lothian websites.

5.9 Accessibility

NHS Lothian websites published after 23rd September 2019 must meet the "[Public Sector Bodies \(Websites and Mobile Applications\) \(No. 2\) Accessibility Regulations 2018](#)."

Therefore, all NHS Lothian websites must meet the [international WCAG 2.1 AA accessibility standard](#).

The Content Management System and our page templates are designed to conform to “AAA” accessibility standards. This ensures that the empty page templates are accessible, but it is the responsibility of Content Editors to ensure that the content they upload is accessible. Further information on Web Accessibility is available on the Intranet.

5.10 Policy Exemptions

There may be cases where websites need not comply with all points of this Policy, due to the nature of the department or service. However, the Communications Department have an overarching responsibility for public and patient communications and must be made aware of all instances where a department has its own website. Each case will be fully reviewed before a decision is made whether to allow a site to exist out with the main NHS Lothian websites, or if in fact the site should belong under a main NHS Lothian website. A regular review of other websites will be carried out by the Communications Department.

5.11 Partnerships

In some arrangements, the service or department may be only part-funded by NHS Lothian, or some staff may belong to another organisation working within the service, or if several organisations are involved in a project.

Partnership websites may be permitted to provide a separate website out with the main NHS Lothian websites, though this still needs to be checked and approved by the Communication Departments.

If at a later date NHS withdraw staff, support or funding from the project and the site is hosted by NHS Lothian but needs to remain operative, then it should be migrated over to the responsible organisation’s web servers.

5.12 Established Service/Branding

Some departments or services have been established for a number of years and as such have a branding which is easily recognised by service users. They may also provide such a diverse range of content and interactivity on their website that isn’t easily transferable to one of the main NHS Lothian websites. This will be reviewed on a case by case basis.

6.0 Associated materials

- [Web Content – Format and guidelines](#)
- [Writing Well for the Web](#)
- [Approved Stand-Alone Websites list](#)

7.0 Evidence base

- [Public Sector Bodies \(Websites and Mobile Applications\) \(No. 2\) Accessibility Regulations 2018](#)
- [International WCAG 2.1 AA accessibility standard](#)

8.0 Stakeholder consultation

Key stakeholders were consulted and their comments have been considered and included, where appropriate, in this policy. This policy was placed on the NHS Lothian Consultation Zone to provide an opportunity for all staff to comment/feedback.

9.0 Monitoring and review

The NHS Lothian Web Services Manager, with oversight provided by the Director of Communications, will continuously monitor compliance with this policy.

This policy will be reviewed, as a minimum, every three years, but may be subject to earlier review in the event of changes to guidance or legislation, or any other factors that may render the policy in need of review.