

## Media Policy

Version 1.1

### Version Control

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<b>Author:</b>	Nick Brooks Senior Communications and Engagement Manager
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<b>For action by:</b>	Staff working for NHS Portsmouth Clinical Commissioning Group
<b>Policy statement:</b>	This policy describes how: <ul style="list-style-type: none"> <li>• The CCG seeks to approach interaction with the news media</li> <li>• The CCG seeks to approach the use of social media</li> <li>• Staff should handle approaches and enquiries from the news media in their professional capacity</li> <li>• Staff should seek to conduct themselves when using social media, both personally and in a professional capacity.</li> </ul>
<b>Responsibility for dissemination to new staff:</b>	Specifically, the HCP Marketing, communications and engagement team, but also, more broadly, managers throughout the CCG, to their team members, and shared teams performing duties on behalf of the CCG.
<b>Training Implications:</b>	For most staff, none. However, a relatively small group of senior staff are required to be trained, and confident, to act as spokespeople.
<b>Further details and additional copies available from:</b>	Marketing, communications and engagement team
<b>Equality Impact Assessment Completed?</b>	Yes
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Website	Key documents: Strategies and policies	<a href="https://www.portsmouthccg.nhs.uk/About-Us/What-we-do/strategies-and-policies.htm">https://www.portsmouthccg.nhs.uk/About-Us/What-we-do/strategies-and-policies.htm</a>

### Review Log:

Include details of when the document was last reviewed:

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# Contents

	Section title	Page
1.0	Introduction and aims	5
2.0	Scope	5
3.0	Responsibilities	5
4.0	Overriding principles	5
5.0	Principles: news media	6
6.0	Handling enquiries from the news media	7
7.0	Anticipating and highlighting negative publicity	8
8.0	Initiating proactive contact with the news media	8
9.0	Social media: principles	9
10.0	Social media: practical guidelines	11
11.0	Major incidents and emergencies	11
12.0	Training	12
13.0	Equality analysis	
14.0	Review	

## **1.0 Introduction and aims**

- 1.1 This policy sets out the approach of NHS Portsmouth Clinical Commissioning Group (“the CCG”) towards the news media, and explains how such interactions will be viewed, and managed. It also accepts that large amounts of public and private discourse increasingly takes place on platforms other than the traditional news media, and thus sets out how the CCG approaches the opportunities and challenges of social media, and how staff should conduct their social media activity both in a professional and a personal capacity.
- 1.2 The aim of this policy is to support staff so that CCG public communications activities are conducted in a way which is consistent with the values and objectives of the CCG, and which support the CCG to achieve its objectives. It should also ensure that all staff understand both the opportunities, and the risks, which are inherent in public-facing communications, know what is expected of them, and how and when to seek support.
- 1.3 In terms of the title of this document, the term “Media Policy” includes both ‘traditional’ print and broadcast media, and also social media – including platforms such as Facebook, Twitter, Instagram, but also platforms such as WhatsApp which might sometimes be considered to host more ‘closed’ conversations. Where appropriate, this policy will seek to differentiate between traditional news media, and social media.

## **2.0 Scope**

- 2.1 This Policy applies to all CCG employees, Governing Board members acting in their CCG capacity, any staff who are seconded to the CCG, contracted and agency staff and any other individual working on CCG premises or working on a CCG led programme of work.
- 2.2 The Policy applies to all contacts made with the media and social media platforms, either initiated proactively or dealt with reactively.
- 2.3 This Policy does not restrict the right of elected staff side representatives of recognised Trade Unions or staff associations to express their views, speaking in that representative capacity, through or to the media directly.
- 2.4 This policy does not restrict independent contractors (for example GPs and pharmacists) from engaging with the media in their own professional capacity, where they are not speaking on behalf of the CCG.

## **3.0 Responsibilities**

- 3.1 The marketing manager heading up the integrated communications and marketing function, is responsible for advising on the contents of this policy.
- 3.2 All managers are responsible for ensuring their reporting staff, anyone working for them on CCG premises, or working on a CCG programme of work they are leading are aware of this policy, and adhere to it.
- 3.3 All staff are responsible for following this policy.

## **4.0 Overriding principles**

- 4.1 As part of the NHS the CCG is a publicly-funded, universal service and in terms of communications such a status brings with it some very clear, absolute obligations. It

is essential that public communications about the work of the CCG (whether being delivered by an individual, or corporately) are honest, transparent, timely and fair.

- 4.2 As a publicly-funded entity, it is to be expected that there will be public interest in the work of the CCG, and that both media organisations and individuals will consider themselves to have a right to know about the work the CCG does. Although there are clear exceptions (such as the protection of personal information, or commercially-sensitive information) the starting assumption is that information about the work of the CCG should be publicly available either proactively (where possible), or reactively (as requested).
- 4.3 The reputation of the NHS is hugely important, and all communications activity – whether corporate or personal – should support that. All dealings with the media should be carefully considered to make sure that nothing is done to wrongly or inadvertently undermine the reputation of the CCG, or the NHS locally or nationally. It is important to note that this does *not* mean that information showing the CCG (or the NHS) in a poor light must be withheld – a central element of the strong reputation of the health service is the trust that people place in it, and that cannot be undermined by any actual or perceived lack of transparency.
- 4.4 National communications guidance, such as ‘Purdah’ during election periods, will be taken into account as required.

## **5.0 Principles: news media**

- 5.1 It is CCG policy to be as open, honest and transparent with the news media as possible, while always respecting service users’ and patients’ confidentiality and the legitimate concerns of any contractors about potentially sensitive commercial matters. An open relationship with news media helps promote mutual understanding, confidence, trust and co-operation and the CCG is committed to developing and maintaining good relations with local, regional and national journalists, including online and trade press. There will be a proactive approach to publicising good news, as well as offering an efficient, timely and responsive service to all enquiries received.
- 5.2 CCG staff should feel encouraged and empowered to consider involving news media in the work they do – there should be a strong presumption that it is in the public interest for people to be aware of, and involved in, the work of those in the public sector who contribute to delivering public services.
- 5.3 CCG staff should feel further empowered to consider seeking a wider audience for the work they do, because it can enhance the reputation of the CCG, and help to position the CCG as a leader of the local NHS. In general, ‘bad news’ will always be generated whenever people feel let down by a service they receive – by contrast, ‘good news’ to balance such accounts is far less likely to appear unless staff act positively and proactively to draw attention to the work they do, and the impact it has. Without that proactive engagement with news and social media, the risk is that public bodies such as the CCG will suffer reputational harm because they are disproportionately associated with critical accounts focusing on shortcomings.
- 5.4 While staff are encouraged to consider proactive, positive engagement with the media, it is essential that such contacts are managed correctly. Proper handling is vital to ensure that messages are in line with CCG policy, consistent and clear, and conducted in a way which allows all relevant parties to be clear about what to expect.
- 5.5 All media activity should involve the marketing, communications and engagement team – normally right from the outset, but in unusual circumstances where that is not possible, at the earliest possible point afterwards. It is recognised that, occasionally, a

journalist may contact a member of CCG staff directly, or come into contact with them at an event. In such instances the staff member should seek to establish the nature of the enquiry, not to engage in a dialogue about the enquiry itself. The journalist should be assured that a member of the marketing, communications and engagement team will be in touch with them. The team should then be contacted, and brought in to assess how best to respond.

## **6.0 Handling enquiries from the news media**

6.1 Should the media directly approach a team or individual member of staff it is essential that no information or comment is made to the journalist at this point. Instead, the member of staff handling the call/enquiry should simply establish: the name of the caller; their organisation; contact number, and the nature of the enquiry, before referring it on to the marketing, communications and engagement team.

6.2 Such a strict approach is essential to ensure:

- The enquiry is dealt with appropriately, thoroughly, within given deadlines
- Any information given is accurate, informative, and a balanced response is reflected in the resulting media coverage
- Any response or comment given is in line with corporate policy
- Any response has received approval from the appropriate director or service lead
- The marketing, communications and engagement team can monitor any subsequent coverage.

6.3 Any written communication issued to the media, whether proactive or reactive, must go through the Marketing, communications and engagement Team.

6.4 On occasions where the CCG is contributing to written communications being issued to the news media by another organisation, then any constituent response being provided by, or on behalf of, the CCG, must go through the Marketing, communications and engagement Team.

6.5 Where the CCG is being asked to respond to *broadcast* media, the marketing, communications and engagement team will first assess whether it is possible, and appropriate, for interview requests to be accommodated. This assessment will be conducted by the marketing, communications and engagement team, in discussion with the relevant service leads and – where required – either the CCG Managing Director or relevant Governing Board member.

6.6 Media interviews should be conducted only by those people who are both able to, confident to, and trained to speak on behalf of the CCG. This group is comprised of:

- Executive GPs
- Senior management team or, in their absence, their deputies
- An appropriate colleague who is nominated by either of the above, and who is supported appropriately to represent the CCG.

6.7 Media interviews shall only be undertaken following consultation with the marketing, communications and engagement team. It is essential that discussions are held before any interview to assess potential areas of questioning and risk, essential content to be included, and appropriate responses.

6.8 It is essential that any communications being provided to the media, either directly by the CCG or via partner organisations, have been through the appropriate approvals process, to ensure accuracy, and completeness. Members of the marketing, communications and engagement team are responsible for agreeing the appropriate

person(s) to 'sign off' communications, and for ensuring that fully informed approval has been secured.

- 6.9 When dealing with the media, consideration must be given to the need to brief colleagues regarding the possibility of media coverage. This consideration will be influenced by the nature of the possible media activity, and its potential impact. As a rule, a 'no surprises' approach should be adopted, both within the CCG and without (for example, NHS England / Improvement). The marketing, communications and engagement team must be involved in discussions about who it is appropriate to brief, when and how.

## **7.0 Anticipating and highlighting negative publicity**

- 7.1 Where an individual is aware of an issue which is likely to result in negative publicity for the CCG, or has noticed negative commentary concerning the CCG, the marketing, communications and engagement team must be informed as soon as possible.

- 7.2 The team will then discuss, and advise, regarding whether preparatory work or holding statements are necessary, or whether a substantive response is required. The following (not exhaustive) list of examples demonstrates occasions where contact should be made with the marketing, communications and engagement team:

- CCG staff are aware that people have contacted the media, or are threatening to do so, regarding services commissioned by the CCG
- Service changes or redesign are being considered which have the potential to be seen as negatively affecting patients or carers
- Upcoming public engagement or consultation work
- Loss of patient data or breaches of the Data Protection Act
- Court hearings or hearings carried out by professional bodies
- Adverse comments made about the organisation on social media.

- 7.3 The list above applies to the work of independent contractors (e.g. GPs, pharmacists) in addition to the CCG's directly employed staff. It is also advisable for staff to be aware of the CCG's Disciplinary Policy. Staff are advised to inform the marketing, communications and engagement team of incidents which may have taken place in other local Trusts and which come to their attention, as these may have implications for, or require a media response from, the CCG as the commissioner of the service.

## **8.0 Initiating 'proactive' contact with the news media**

- 8.1 As set out in Section 4, CCG staff should feel empowered, and encouraged, to consider involving public audiences in their work. CCG colleagues wishing to initiate news or social media coverage of their work should contact the marketing, communications and engagement team in the first instance to discuss the possible approach and desired result. The team will be able to offer advice on matters which could affect the extent or the success of any media coverage, including:

- Advice on timing, in order to ensure the media have enough lead-in time to include articles and/or arrange photography, filming or recording
- Advice on scheduling, for example avoiding electoral Purdah (if appropriate) or any other events or stories which are likely to dominate the media on any given day
- Identification of the most suitable spokesperson / spokespeople
- Key information to include, such as statistics and contacts for further information
- Advice regarding the most effective approaches, and 'lines to take', as well identifying potential risks.

8.2 The marketing, communications and engagement team will also offer advice on other potential channels of communication. In an environment where traditional media organisations are increasingly losing their monopoly on hosting public discourse, it is important that CCG staff are encouraged to recognise that issuing media releases is only one possible action, amongst many other opportunities.

## **9.0 Social media: principles**

9.1 As set out in Section 5 regarding the principles of dealing with news media, it is CCG policy to be as open, honest and transparent as possible. Social media should no longer be considered as 'new media' – it has now become an integral part (indeed often *the* integral part) of public debate, and so those overarching principles continue to apply.

9.2 Unlike traditional media, social media provides the ready possibility of both professional, and personal, activity. This diversification, and the ability for individuals to simultaneously have several voices, roles and identities, offers a wealth of opportunities but also the risk of the professional and the personal becoming intertwined in a way which may negatively impact the standing of the individual, or the CCG, or both.

9.3 This policy will address the use of both corporate and personal accounts. In the case of the former, policy is relatively clear and easily applied. In the case of the latter it is less so, and so greater attention and consideration is required.

9.4 Social media accounts which are used – either wholly, or in part – for professional purposes (whether corporate accounts, or accounts run by individuals) offer the opportunity to:

- Disseminate corporate messages, and service information
- Engage in two-way dialogue – not just sending messages out, but also giving people the chance to engage with, and respond to, those messages
- Raise awareness of services and CCG activity, and provide a mechanism for feedback
- Direct social media users to CCG web pages or other digital resources
- Support the work of partners and stakeholders
- Enhance the visibility, and reputation, of the CCG.

9.5 CCG employees who operate personal social media accounts are entirely at liberty to use those accounts for the purposes outlined in Section 9.4, above – promoting the work of the CCG and its partners through such channels is entirely legitimate, but should absolutely not be thought of as a necessary part of their employment.

9.6 All staff members posting, or responding to, activity on online articles, blogs, message boards, tweets, Facebook posts or content on any other digital forum must take care to ensure that:

- Internet users are able to distinguish official corporate CCG information from the personal opinion of staff. Staff must be clear as to whether they are posting in a personal, or a professional, capacity.
- The organisation's reputation is not brought into disrepute – either directly, or by association. It is not necessary to explicitly state that you work for the CCG for your activity to risk bringing the reputation of your employer into disrepute.
- They are aware of the standards and conduct that are expected of CCG staff – the same principles and guidelines which apply to staff activities in general, also apply to online activity.
- The CCG is not exposed to legal risk.

- They do not publish any patient information, in accordance with Data Protection legislation, and the Health and Social Care Act 2012.
- They adhere to the organisation's core behaviours and conduct themselves in a professional manner at all times.
- They adhere to relevant IT policies.

9.7 Staff should ensure they use social media responsibly and consider the following:

- Even if you do not name the CCG as your employer on social media, the principles outlined in 9.6 will still apply if a connection with the organisation can be reasonably made – you do not have to name your employing organisation to risk bringing its reputation into disrepute.
- Staff should add an appropriate disclaimer on a personal account if they have identified themselves as a member of CCG staff, such as: "The views expressed here are my own and in no way reflect the views of (employer)". However, using such a disclaimer on its own should **not** be considered a sufficient precaution to protect the online actions of the individual from negatively impacting the reputation of the CCG – employees must still consider the potential impact of their public activity, be aware that they are personally responsible for it, and consider whether it could affect the reputation or operations of their employer.
- Assume that every post could be read by anyone. It is important to realise that even appropriate privacy settings have limitations. Once something is shared, you can no longer control it - it can be captured and redistributed even if you later delete the content, and can be available forever. If you have used social media for a number of years, it important to consider what you have posted online in the past.
- If discussing CCG-related content online staff should clearly identify themselves, write in the first person, and make it clear whether they are speaking on behalf of themselves as an individual, or on behalf of their employer.
- Do not engage with any form of public discussion about an individual's personal circumstances, beyond that which is absolutely necessary. Any social media exchange involving an individual's personal details should not go beyond an acknowledgement of the contact, and either a) a suggestion for them to redirect their concerns to the most appropriate channel for them to receive advice or support, or b) a respectful invitation to continue the conversation in a more direct, private capacity.
- If in doubt – take advice. The CCG's marketing, communications and engagement team can provide guidance.

9.8 Staff are permitted to use social media on NHS equipment, at work, but this is on condition that the use:

- Does not conflict with, or interfere with, normal work duties
- Is with the agreement of the line manager
- Is controlled and proportionate in terms of the amount of time spent
- Continues to adhere to the principles set out in Section 9.6 and 9.7, above.

9.9 The growing popularity of (often encrypted) direct messaging platforms such as WhatsApp or Facebook Messenger poses new questions for organisations regarding governance and behaviour. Given the apparently closed and private nature of the format, there is a risk that CCG employees may consider activity on such platforms to be secure – it isn't. All employees must be mindful that any activity which is shared

with anyone – regardless of how apparently private the platform may be – is automatically beyond their control and can be subsequently shared with others, without their permission or knowledge. Anything which is written or shared on direct messaging services such as WhatsApp has the potential to subsequently become public, and so the considerations set out in section 9.6 of this policy continue to apply.

## **10.0 Social media: practical guidelines**

- 10.1 Staff access to official CCG social media accounts will be limited to authorised marketing, communications and engagement team members.
- 10.2 The CCG social media accounts will be routinely monitored Monday to Friday during office hours.
- 10.3 Social media will be used not only to promote our work and corporate messages, but also to support our partners, staff and appropriate local enterprises through likes, mentions and retweets.
- 10.4 Events and projects will, where possible, be branded with an appropriate hash-tag and used throughout the promotion and event itself.
- 10.5 When staff are using personal social media accounts in a professional capacity, they are reminded that they represent the CCG and should conduct themselves in the same professional manner in which they would in the workplace. It is also suggested that they state on their profile that their 'views are their own', but do not assume that such an action is, in itself, sufficient to enable comments or activity which may be detrimental to the reputation of the CCG.
- 10.6 When staff are using personal social media accounts in a professional capacity they should make the marketing, communications and engagement team aware of such activity. This will allow the team to offer support from corporate accounts, monitor impact, and to advise on content and approach.

## **11.0 Major incidents and emergencies**

- 11.1 In the event of a major incident or a threat to business continuity, there may be news media and / or social media interest which need to be managed. In such circumstances staff should respond to any approaches in the same way as is outlined in Section 6 of this policy.
- 11.2 During major incidents and emergencies the marketing, communications and engagement team will be required to work closely with partner agencies, as will other CCG colleagues. This will be done through the Hampshire and Isle of Wight Local Resilience Forum Media Cell – normally the police service will lead such a co-ordinated response. As part of this collective response to a crisis, CCG staff may be required to support the communications activity of other statutory agencies.
- 11.3 Should a major incident, or threat to business continuity, take place, staff should be aware that the potential for them to play a positive role through the use of social media is heightened at this time. Assisting with the dissemination of important information can help both members of the public and the emergency services respond to a situation. Staff must be aware:
  - Information should only be shared if it is from official, trusted sources
  - They should not share confidential or sensitive information that they may have become aware of through the organisation or its partners during a major incident, unless authorised to do so from the marketing, communications and engagement team

- 11.4 During a major incident, it is essential that information released by the CCG does not contradict statements made by partner agencies.
- 11.5 The responsibility for internal communications sits with each partner organisation. However, each organisation must ensure that key messages are being used which are consistent with those being issued by the Media Cell or the lead agency where appropriate.
- 11.6 During a major incident, as at any other time, it is the responsibility of line managers to ensure that their colleagues are able to receive information in a timely way.

## **12.0 Training**

- 12.1 Senior CCG staff – including members of the Governing Board, and clinical leads – should expect that their role may require them to be available for media interviews, either to proactively promote good news, or to reactively respond to questions about policy or practice. The marketing, communications and engagement team should arrange appropriate media training for this group, as required.
- 12.2 On some occasions there may an opportunity, or a requirement, for other members of staff, especially those senior managers who are responsible for particular areas of work, to work with the media or to participate in the response to journalists. In such cases, the marketing, communications and engagement team will either provide, or facilitate, targeted support and preparation to enable the individual to respond confidently and appropriately.

## **13.0 Equality analysis**

- 13.1 See Equality Impact Assessment at Appendix One.

## **14.0 Review**

- 14.1 This policy will be reviewed every two years.
- 14.2 Minor changes, which do not impact on the substance of the policy, may be made outside the formal review process, with the approval of the marketing manager leading the integrated marketing, communications and engagement team.