

Media Policy

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September 2022	V2	Policy amended to reflect Lancashire and South Cumbria ICB procedures and approvals process.
October 2022	V3	References to Governing Body changed to ICB Board.

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1. Introduction

The NHS is a publicly funded and publicly accountable service that almost without exception, impacts everyone.

The NHS is of ongoing interest to the public and is constantly in the news with issues such as funding, performance, medical advances and access. All of these issues are regular topics of political debate.

The ICB's approach is to be open and cooperative with the media while bearing in mind the duty to observe and maintain the confidentiality of patients and colleagues.

The media are important to the organisation in helping to convey news and information to the population we serve, and it is in both our and the media's interest to establish good working relationships.

It is important to note that many people, including employees, base their perception of the organisation and the NHS on what they read online, in newspapers, hear on the radio and watch on television.

2. Purpose: overall aims and objectives

- Build, develop and maintain a good relationship between the organisation and the media.
- Promote health and wellbeing and tackle health inequalities.
- Build public confidence in NHS services.
- Build and maintain a positive reputation for the ICB and wider NHS.
- Boost staff morale by encouraging and acknowledging best practice.
- The ICB's tone of voice is open, honest and transparent, ensuring that matters are explained in plain English.

Objectives

- Produce materials that the media would be interested in from actions within the organisation's services and operations.
- Issue appropriate and timely press releases.
- Respond to all media enquiries quickly, efficiently and within realistic deadlines.
- Rebut false or inaccurate information as soon as possible.
- Present a positive and open image of the organisation.

This policy sets out guidelines for working with the media for NHS Lancashire and South Cumbria Integrated Care Board (ICB).

3. Scope

This policy applies to all employees of NHS Lancashire and South Cumbria ICB.

4. Definitions

'Media': This refers to all news media including newspapers, journals and magazines, broadcast (radio, TV and film), online (including professional bloggers and paid key influencers using online platforms) and news agencies. This policy extends to the social media accounts of the media as well as their own websites. Enquiries may be from local, regional, national and international media outlets.

5. Policy

The ICB communications and engagement team acts as the initial point of contact and coordinates all media enquiries concerning the ICB.

5.1. Responding to enquiries

The team is the first point of contact for journalists during office hours of Monday to Friday, 9am-5pm and arrangements will be put in place by the team to manage out-of-hours enquiries in an appropriate manner.

Any employee contacted by the media or about any other matter relating to the press is requested to immediately refer all such enquiries to the communications and engagement team.

This is particularly important when new members of the media inadvertently bypass this process and speak to members of staff not authorised to respond.

The communications and engagement team logs all media enquiries, responses issued and the source of information.

This enables coordinated responses to be issued to enquiries on similar subjects and facilitates media monitoring.

Once the enquiries are logged, the appropriate personnel are contacted, and a response is prepared. When the information has been agreed upon, the communications and engagement team will respond to the enquiry directly or arrange for the relevant ICB official to respond.

In all cases, where someone is not available the next most appropriate person will be asked to coordinate/agree to any press statement or perform an interview, bearing in mind the given media deadline.

Responses to media enquiries will be cleared by the most appropriate person/people within the organisation or, where there is a sensitive/high-level issue involved, an

appropriate ICB senior leader or executive prior to issue. The most appropriate person to sign off responses will be determined by the communications and engagement team in consultation with the director of communications or another senior communications officer.

5.2. Interviews

Employees should not agree to give radio or TV interviews without first seeking consultation from the communications and engagement team.

The communications and engagement team will coordinate arrangements and help with preparations and briefing.

Wherever possible the most appropriate person will undertake the interview and appropriate training/support will be offered.

5.3. Out-of-Hours

If any member of staff is approached by a journalist outside of office hours, they should note down contact details for the journalist and the nature of the enquiry; no response should be made. Simply tell the reporter that you will get back to them as soon as possible during normal working hours.

Contact the senior manager on-call who will make necessary arrangements for a response to be made, however, if the enquiry isn't urgent then it will be dealt with the next working day by the Communications and Engagement team.

If needed out-of-hours support will be provided by NHS Midlands and Lancashire CSU out-of-hours service and the number to ring is 0333 150 1602.

5.4. Dealing with Negative Issues

The work of the ICB involves complex and often confidential matters that can have a direct impact on the lives of our population. Understandably such issues are often in the public interest and as such attract considerable media scrutiny, both negative and positive.

When and if mistakes are made, or controversial decisions are taken, these will be communicated to the media in a frank, factual and open way. Where necessary an apology will be given, and an explanation provided, of how things will be put right. The ICB will aim to respond to all enquiries.

If the media cannot get information from a credible source, they may go elsewhere. This can lead to facts being misconstrued and could be more damaging to the ICB's reputation. When media enquiries are received that relate to individuals it is the policy of the ICB in the interest of confidentiality not to comment on individual patients. Advice will be sought from the organisation's Caldicott Guardian on all matters where patient

information is in the public domain, e.g., when an individual case may be named in the enquiry or reported by the media.

Directors should ensure that the communications and engagement team is informed at the earliest opportunity of any issue that may attract controversy. The communications and engagement team needs to respond quickly to requests for information from the press and provide an accurate and full briefing in order to put the organisation's view forward. Quite often the communications and engagement team is given very short deadlines to respond to media requests and is therefore reliant on staff providing the necessary information in order to draft a response within the time given.

5.5. Making/Issuing Rebuttal Statements

Occasionally the press will print misinformation that can be damaging to the organisation's reputation. When this is felt to be unjustified, where untruths have been printed or facts interpreted wrongly, appropriate senior leads will be consulted, and a rebuttal statement issued when deemed necessary.

Personal contact, briefing notes and letters to the editor are rebuttal tools that can be used.

Again, time is of the essence and a speedy response is essential.

While the organisation is careful not to enter into debate on particular issues through the press, the rebuttal tools available can be used to add to the discussion on any issue currently in the public's interest.

5.6. Press Releases

Press releases are probably the most used tool in securing media coverage. The ICB is encouraged to make use of press releases to publicise matters of interest, decisions that have been made/ taken, events, achievements, etc.

All employees should encourage and adopt a proactive approach to providing information about their services and how to access them.

All press releases are issued through the media team. Up-to-date media contacts lists are kept, and releases can be targeted to specific journalists and media.

The communications and engagement team will liaise with other personnel prior to any release being issued to clarify/check facts. Information should be forwarded as soon as possible.

Media deadlines need to be kept in mind, especially for weekly or monthly publications. A record of all press releases issued by the organisation is kept on a database.

The communications and engagement team can refer to any past press release on request.

5.7. Approval Procedure

Once the information for the press release has been gathered, the draft version will be forwarded by the communications and engagement team to the relevant manager/clinical lead for amendments/approval.

Once amendments have been made the final press release will be issued by the communications and engagement team.

Once approved it is then issued by the communications and engagement team.

5.8. ICB Board Reports

The media can pick up items from papers and agendas and report on them before the meeting or by attending meetings.

Wherever possible, directors should forewarn the ICB's director of communications about reports that might attract media interest when they are being drafted.

A member of the communications and engagement team attends relevant public meetings, will scan the agendas and highlight potential areas of interest.

If appropriate, press releases will be prepared in advance of a meeting or forewarning will be given when a statement will be needed the day after.

This speeds up response times to enquiries and also helps the reporter by providing a more convenient and readable source of information.

5.9. Joint Press Releases

When a press release is issued jointly with any of our partners, e.g., other NHS trusts or local councils, the same approval procedure must be followed.

When a comment is requested by a partner agency for inclusion in a press release to be issued by them this request must be coordinated by the communications and engagement team.

5.10. Distribution

Most press releases are sent by email to a standard distribution list. Releases can also be sent to targeted magazines/journals as requested and as appropriate.

Where a press release is locality specific the distribution will be targeted to the most appropriate media.

All press releases are available on the ICB's website.

5.11. Photography

A photograph can greatly enhance publicity by drawing the reader's eye and increasing the amount of space given to a story.

It is possible to add a photo opportunity on a press release inviting the media to send along their own photographer.

It is often useful to stage a photograph prior to an event to ensure the media can use the photo.

Action photographs showing no more than three people often work better than large groups and are more likely to be used by the media. Even if a photograph is sent along with a press release there is no guarantee that the papers will use it.

Patients and staff must give their explicit consent to their photograph being taken and used.

Please contact the communications and engagement team prior to taking or using photographs of the public or staff to obtain the relevant publicity consent forms.

5.12. Embargo

An embargo is a request to the media to delay publishing or broadcasting information provided until after a specified date and time.

However, it is not binding and should be avoided whenever possible as errors can occur on the systems that reporters use.

An embargo request should be clearly marked at the top of a press release e.g., EMBARGOED UNTIL 00.00hours on 2 January 2022.

6. Elections and Political Affiliations

All ICB Board members and staff must remain apolitical when making public statements and any personal social media profiles should state clearly that all comments and views are that of the individual and not representative of the organisation.

Individual members of staff are free to express political viewpoints outside the workplace when they are not representing the ICB.

Visits by politicians during pre-election periods (Purdah) are not allowed. This is to enable us to maintain a level playing field for all political candidates and maintain our own impartiality.

7. Press Conferences /Special Events/Launches/Photo Calls

Press conferences will only be used for major events, 'firsts' or when a press release will not suffice, e.g. launching a major facility or initiative, updates during a major incident, or explaining a complex issue such as major budget changes.

The communications and engagement team can advise and assist in the preparation and organisation of a press conference/ launch.

At least two weeks' notice of any event or initiative for which publicity is preferable to meet the deadlines of the weekly papers and to send out invitations etc.

8. Dealing with Emergency Situations

Handling the media in the event of a major disaster or emergency situation is covered in the organisation's Emergency Plan.

9. Raising Issues of Concern

All staff are expected to bring issues or concerns to the attention of the organisation, through departmental structures and processes, before approaching the media. Staff should refer to the organisation's Whistle-blowing Policy for further guidance.

10. Media Presence on any ICB Site

Journalists and photographers must seek permission from the media team before they enter non-public areas of any ICB site. The communications and engagement team must be informed of journalists being invited onto an ICB site.

11. Writing for Professional Publications

Employees are sometimes involved in producing articles for publication in professional or health-related journals/ publications. In these cases, staff are requested to ensure that they have informed their line manager of the article and where it will be published.

In the event of the article including information regarding the organisation, staff are requested to liaise with the media team prior to publication.

12. Press Complaints Commission

Journalists are required to adhere to a code of practice, which is available at <https://www.ipso.co.uk/>

Staff are asked to refer any issues that warrant exploring the use of this code to the communications and engagement team.

13. Conclusion

It is essential that the ICB develops and maintains good working relationships with the media to present a positive and open image of the organisation.

These guidelines clarify the way in which this is being and should be done.

Copies of these guidelines are available on the intranet.

It is the responsibility of each line manager to communicate these guidelines clearly to all staff.

14. Equality and Health Inequalities Impact Risk Assessment (EHIIRA)

The ICB aims to design and implement services, policies and measures that meet the diverse needs of our service, population and workforce, making sure none are placed at a disadvantage to others.

A stage 1 Equality and Health Inequalities Impact and Risk Assessment (EHIIRA) in relation to this policy has been completed. There is no requirement for a stage 2 (EHIIRA)

15. Implementation and Dissemination

The policy will be implemented by the ICB communications and engagement directorate and shared with wider ICB staff via the social media section of the intranet and line managers.

16. Training Requirements

While there are no specific training requirements, there are specific roles that need to be familiar with the document:

- Members of the communications and engagement directorate.
- Members of the HR function.
- Line managers.
- Anybody wishing to partake in media interviews with support from the communications and engagement team.

17. Monitoring and Review Arrangements

This policy will be monitored and reviewed by the communications and engagement directorate. Its impact will be monitored and measured through regular insight reports

which will be presented to the Public Involvement and Engagement Advisory Committee.

18. Non-compliance

This policy applies to all forms of communication, whether it be verbal, print or online. Staff should remember that they are ultimately responsible for what they publish and that there can be consequences if policies are not adhered to. If you are considering publishing something that makes you even slightly uncomfortable, review this policy and ask yourself why that is. If you're in doubt or in need of further guidance, please contact the C&E directorate to discuss.

Non-compliance with this policy may lead to disciplinary action in accordance with the ICB's disciplinary policy. You are also reminded that actions online can be in breach of the related policies listed on the front page of this policy and any breach may be treated as misconduct.

19. Consultation

The policy has been shared for consideration by ICB communications and engagement professionals to ensure it meets best practice standards. The policy aligns with best practice set out in other NHS organisations.