



**Joint Policy for Cumbria Partnership Foundation Trust & North Cumbria
University Hospital NHS Trust**

Policy Title: Media Management Policy

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Accountable Director	Executive Director of Workforce, Organisational Development & Engagement
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Policy On A Page

SUMMARY & AIM

It is vitally important that we have high standards of communication, engagement and involvement with our patients, our staff, the public, media, local GPs, partners and stakeholders. Therefore, our communications have to be clear, accessible, concise, honest, transparent and professional, whilst ensuring that confidentiality and consent are maintained at all times.

Our aims when dealing with the media are:

- We will always be open and transparent
- Wherever possible, we will co-operate with the media due to public interest in the NHS and their ability to get news to a wide audience quickly
- We will respect the confidentiality of patients and staff at all times
- We will deal with media enquiries in a timely manner
- Only those with the appropriate knowledge and expertise will represent the Trust in the media

KEY REQUIREMENTS

1. It is important for all staff to be aware of the Trust's protocol relating to managing any requests from the media
2. Staff must comply with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR), the code of confidentiality and any relevant professional codes of conduct when dealing with the media, even when they are off-duty
3. Staff must consider the potential impact on the reputation of the both themselves and the Trust if they are engaging with the media

TARGET AUDIENCE:

This policy applies to all Trust employees at Cumbria Partnership NHS Foundation Trust and North Cumbria University Hospitals NHS Trust

TRAINING:

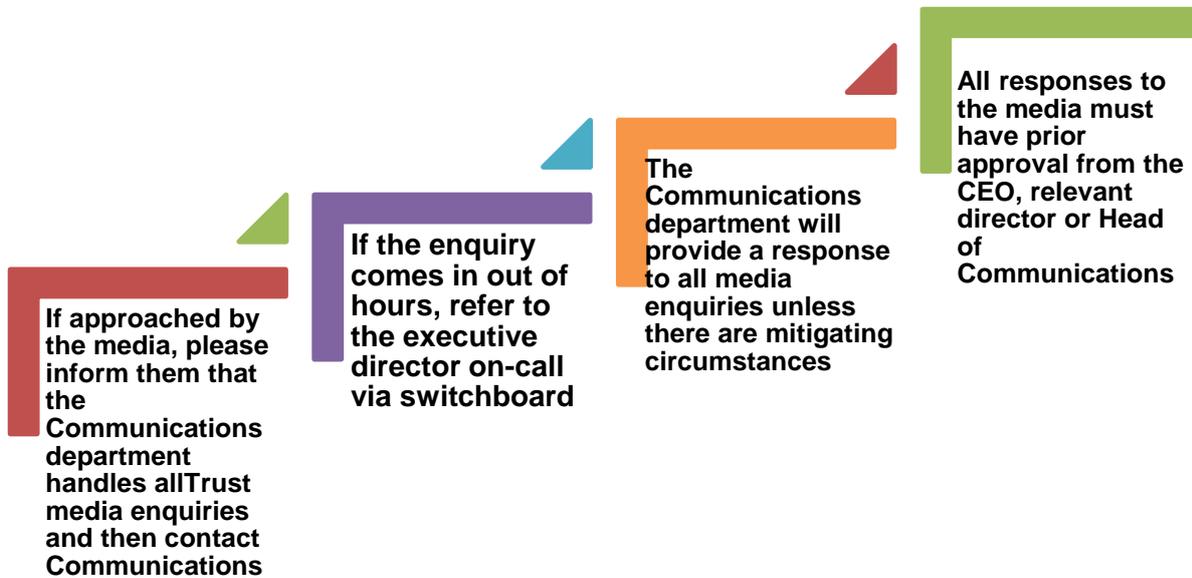
No mandatory training required for this policy but specific requests for media training should be submitted to the Communications team.

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SUMMARY FLOWCHART

Handling a media enquiry



1. INTRODUCTION

Maintaining public confidence and acting with candour are major elements of our overall approach to communications and engagement. Clearly, reputation is extremely important in ensuring that the public and patients have confidence in the services provided by the Trust, and for any staff who wish to join the Trust. Therefore, it is extremely important that accurate, consistent and timely information is provided to the media.

Our communications must ensure that confidentiality and consent are maintained at all times and have to be clear, accessible, concise, honest, transparent and professional.

2. PURPOSE

This policy is in place to:

- Ensure that information is communicated to the media in an open, transparent, consistent and timely manner.
- Ensure that managers receive communications advice on all aspects of media handling according to national and regional guidelines where appropriate.
- Ensure only those with appropriate knowledge represent the Trust in the media.
- Establish good media relations through a central point.
- Protect employees from unexpected approaches by the media.
- Ensure that information given to the media is correct, appropriate and timely.

3. POLICY DETAILS

3.1 Media Enquiries

All media enquiries must be directed to the communications team during working hours via the communications helpdesk:

Telephone: 01228 603890

E-mail: communications.helpdesk@cumbria.nhs.uk

Staff who receive requests for information from the media must direct the journalist to the communications helpdesk and alert the communications helpdesk about the nature of the enquiry they have received.

Staff must not attempt to handle media enquiries relating to the Trust, its patients or its staff themselves unless authorised to do so by the Trust. A response is provided to all media enquiries unless there are mitigating circumstances. The form of response may include a written statement or a verbal interview from an appropriate Trust representative.

All calls will be logged by the communications team with the name of the journalist, the publication they work for; the nature of the enquiry; the deadline they are working to and their contact details.

The communications team will discuss with the relevant executive or senior managers on how to respond and advise whether a previous call on the same issue has been logged. This process enables consistent messages to be given to the media.

If a staff member has breached the media relations protocol an electronic incident form must be completed.

Completed media enquiries are held by the communications team. For further guidance, there is a communications toolkit for staff: Dealing with the media and reputational risks. https://staff.cumbria.nhs.uk/download_file/663/753

Members of staff and Trust Board members must only engage in media activity on behalf of the Trust after consulting the communications team.

If members of staff are asked to speak to the media in a personal or professional capacity about matters which do not relate to the Trust, they are free to do so but are urged to make the Communications team aware at the earliest opportunity so that the communication team can offer any appropriate advice and guidance.

Sometimes it is appropriate to respond to enquiries by journalists by giving them a written statement rather than a verbal response. Statements will be emailed by the communications team to the journalist who makes the enquiry on an individual basis only.

3.1.1 Out of hours media enquiries

The Communications team does not operate an on-call out of hour's rota. For any urgent communications and press matters received out of hours, please call the main hospital switchboard and ask to speak to the Gold on-call (01228 523444).

If Gold on-call managers receive out of hours enquiries from the media they must make a note of the enquiry and pass it on to the communications team during normal working hours.

If the media enquiry is of an urgent nature the Gold on-call manager must agree a response with an executive director. This response must be recorded and passed onto the communications team so that they can pick up during normal working hours.

3.2 Proactive communications

Staff are best placed to identify stories and news from their areas that are improving the service for the benefit of patients. Staff should contact the Communications team in relation to this and seek advice prior to any proactive work with the media. There are also communications toolkits which are a useful resource available at: <https://staff.cumbria.nhs.uk/services/communication/communications-toolkit>

The Communications team actively encourages all staff to be proactive in identifying stories of interest and is always happy to help support any staff member or team who would like to publicise a good news story where appropriate. The team will offer advice, write and distribute press releases and set up media interviews.

The communications team will draft all news releases using the standard news release style set out in the distribution programme called Vuelio.

The communications team will give consideration to the eight strands of equality and diversity have been considered (race, disability, gender, religion/spirituality, sexual

orientation and age, pregnancy and maternity and gender reassignment) and ensure no assumptions have been made relating to these.

The Communications team will seek approval from an executive director for all news releases and then will circulate to all the local media (including TV and radio stations), relevant staff, governors and partner organisations.

3.3 Approval/distribution process

All press releases and statements must be approved by the most appropriate executive director or head of communications; this is facilitated by the communications team. If the Trust sends out any proactive press releases, they are distributed to the local media, local and regional NHS colleagues, local MPs and stakeholders. All stories are also posted on the Trust's websites, Facebook pages and Twitter feeds.

Trust Directors receive a weekly round-up of all media coverage from the communications team relating to the Trust for information purposes.

3.4 Social media

Social media is now having a huge impact on the way people consume media and discuss healthcare. In the UK, the whole healthcare sector is represented on multiple social media platforms.

Social media is easily accessible globally from laptops, PCs and mobile devices so it is an effective way of getting a message out to millions of people in a matter of seconds. We aim to use social media as another tool to keep members of the public up to date with news from the Trust, job opportunities and health promotions. Our social media channels are also frequently used by staff.

It is really important to remember that working in the NHS can mean social media profiles are of interest to the media so it is important to take the appropriate steps to protect ourselves online. The best advice from NHS Employers is to check the privacy settings on social media profiles and always remember the rule "If you wouldn't say it aloud in the canteen, don't post it online."

For more information, the Trusts Social Media Policy can be accessed at the Trust's policy pages.

Our Social media handles are:

CPFT Facebook: @CPNHSFT	NCUH Facebook: @NorthCumbriaNHS
CPFT Twitter: @CPFTNHS	NCUH Twitter: @NorthCumbriaNHS

3.5 Filming requests

The Trust receives many requests for TV interviews, and documentary and location filming. All proposals are considered and accommodated where possible and when appropriate. If a staff member receives a request for filming in their department or would like to film for a project, please direct the enquiry to the Communications team.

Any film crews or photographers on site at our hospitals without prior consent from the Communications team will be asked to leave. If any member of staff sees a film crew or photographer on site and they are not accompanied by Trust staff, please inform the Communications team immediately.

3.6 Raising concerns about media coverage

All media outlets must adhere to the standards set out in the Editors' Code of Practice. The majority of the press we deal with are respectful of the rules and will not cause any issues. However, if they do, we will take action.

If a member of staff has a question about any media coverage they have seen about the Trust, please contact the Communications team.

3.7 Consent and confidentiality

As NHS employees, we all have a duty to protect patient and staff confidentiality. In line with General Data Protection Regulations (GDPR) and Data Protection Act 2018 we cannot give out information that will lead to the identification of a patient or staff member or their presence in the hospital without their informed consent. Although it is noted that some staff members are identified on line in their professional capacity.

If a request is received about a particular patient, the team liaises with the clinical teams involved to obtain consent from the patient before releasing any information.

If a request is received about a member of staff and it is appropriate to disclose information, the team liaises with the individual and relevant management colleagues to obtain appropriate consent before releasing any information.

3.8 Condition checks

Sometimes the media request information about a particular patient's progress, especially if the case has attracted media coverage such as a road traffic accident. These requests are dealt with by the Communications team unless the patient, their family or the police has requested otherwise. The reason for this is to ensure that confidentiality is upheld and reporting is as accurate as possible, as it can be very distressing for patients or their families to see incorrect reporting.

Even though the level of detail required in a response to a condition check is very basic (such as 'stable' or 'critical'), consent needs to be sought from the patient or relatives before any information can be released. Without consent, no patient information can be disclosed.

3.9 Official visits

Occasionally, we can treat high profile patients, who can attract media coverage such as celebrities, VIPs or even patients under police guard. It is important to remember that these patients are entitled to the same level of confidentiality and consent is still paramount.

If there is a high profile patient on a ward, it is important to inform the Communications team as soon as possible.

Sometimes, the Trust hosts VIP visits such as high profile MPs etc. These visits must be organised through the Chief Executive's office and the Communications team to ensure that strict protocols surrounding the visit are met. In addition, the visitor must be accompanied by a member of Trust staff at all times.

A joint policy will be developed and until then staff are advised to follow the above advice and that which is set out in the CPFT policy: POL/002/097 managing official visits procedure.

3.10 Staff side / trade union representatives

Staff side / trade union representatives are free to comment to the press in their roles. However, in the spirit of good partnership working, it is expected that those representatives who are also employees of the Trust inform the Communications team if they will be giving press interviews in their Trade Union capacity.

3.11 Major incidents

There are separate arrangements for handling the media in a crisis situation or major incident.

3.12 Public meetings

During any public meetings held about the Trust or its services, staff are free to attend as members of the local community. However, staff must always comply with their professional code of conduct and confidentiality when attending any meetings of this nature, even if they are held outside of their working hours.

3.13 Co-production

There may be occasions when members of staff from the trusts are working with patients and community groups and comments made in this environment may be reported through the media.

The spirit of co-production supports open conversations. If conversations or challenges are subsequently reported you must contact one of the heads of communications to discuss the issues being raised and discuss support with an appropriate response.

4. TRAINING AND SUPPORT

There is no mandatory training associated with this policy. Ad hoc media training is available based on an individual's training need as defined within their annual appraisal or through the incident reporting system.

5. PROCESS FOR MONITORING COMPLIANCE

Breaches of the Media Management policy such as patient confidentiality will be handled through Human Resources and Information Governance.

The table below outlines the Trusts' monitoring arrangements for this policy/document. The Trust reserves the right to commission additional work or change the monitoring arrangements to meet organisational needs.

Aspect being monitored	Monitoring Methodology	Reporting		
		Presented by	Committee	Frequency
Media coverage	Daily check by communications team	Head of communications	CMG	Monthly

Wherever the above monitoring has identified deficiencies, the following must be in place:

- Action plan
- Progress of action plan monitored by the *name of relevant committee* minutes
- Risks will be considered for inclusion in the appropriate risk registers

6. ASSOCIATED DOCUMENTATION:

Social media policy

Freedom of Information Act policy

Confidentiality policy

Managing official visits procedure: https://cdn.cumbriapartnership.nhs.uk/uploads/policy/documents/Managing_official_visits_procedure_POL-002-097.pdf

Dealing with the media and reputational risks toolkit
https://staff.cumbria.nhs.uk/download_file/663/753

8. DUTIES (ROLES & RESPONSIBILITIES):

8.1 Chief Executive / Trust Board Responsibilities:

The Chief Executive and Trust Board jointly have overall responsibility for the strategic and operational management of the Trust, including ensuring that Trust policies comply with all legal, statutory and good practice requirements.

The Chief Executive has the executive responsibility for the Media policy and they or a deputy would approve the provision of any formal media coaching for staff. The CEO has overall responsibility for sign off of all media responses.

8.2 Executive Director Responsibilities: Executive Director of Workforce, Organisational Development & Engagement

Executive Directors are responsible for signing off of all news releases and statements regarding their directorate for the media.

Executive Directors or the appointed Gold on call have responsibility for fielding and responding to media enquiries out-of-hours when they are on-call for the Trust.

8.3 Director of Workforce, Organisational Development & Engagement

The Director of Workforce, Organisational Development and Engagement is the executive director with nominated responsibility for media relations

8.4 Head of Communications and Communications Manager

The head of communications has overall responsibility to gain the appropriate sign off for all media enquiries. This could include escalating sign off to executive directors or to the CEO.

The head of communications is responsible to the chief executive and the board of directors for the development and implementation of the Media policy and acts as an advocate for communications in both internal and external discussions.

The Head of Communications and the Communications Managers are responsible for:

- Developing and overseeing the approach to media relations
- Generating and issuing news releases following approval by executive directors.
- Recording and responding to media enquiries in a timely manner.
- Providing support and guidance to teams wishing to communicate with the general public.
- Providing advice and support to employees and managers who have been contacted by the media.

8.5 Line Managers

Clinical and support service line managers are responsible for:

- Liaising with the communications department where media enquiries relate to or have been received by their services.
- Communicating issues/complaints about their services which may result in media coverage.
- Identifying good news stories from within their team and notifying the communications department of these.
- Ensuring that communications advice is sought prior to proactive work with the media.
- Line Managers are responsible for ensuring their staff are aware of this policy and for reporting any serious breaches appropriately.

8.6 All staff

All staff are responsible for:

- Advising journalists that all enquiries must be directed to the communications department.
- Informing communications department of proactive work they would like to undertake.
- Informing managers and the communications team when they have been approached by the media.

8.7 Communications team

The communications team is responsible for fielding all enquiries from the media and for facilitating any resulting activity such as liaising with film crews and ensuring appropriate consent is obtained. The team are also responsible for circulating any press coverage to the Trust's executive directors, updating the Trust's website and social media profiles.

9. ABBREVIATIONS / DEFINITION OF TERMS USED

Keep lists in alphabetical order

ABBREVIATION	DEFINITION
CEO	Chief Executive Officer
CMG	Clinical Management Group
GP	General Practitioner
MP	Member of Parliament
NHS	National Health Service
VIP	'Very Important Person'

TERM USED	DEFINITION
Social media	Social media includes the various online technology tools that enable people to communicate via the internet to share information and resources. Social media can include text, audio, video, images, podcasts, and other multimedia communications.
Media	the main means of mass communication (television, radio, and newspapers) regarded collectively

DOCUMENT CONTROL

Equality Impact Assessment Date	
Sub-Committee & Approval Date	<i>Joint Information Governance Board 17/05/2019</i>

History of previous published versions of this document:

Trust	Version	Ratified Date	Review Date	Date Published
NCUH RM27	1.0	09/01/2017	31/12/2019	09/01/2017
CPFT POL/002/011	1.0	October 2015	October 2017 (extended to June 2019)	October 2015

Statement of changes made from previous version

Version	Date	Section & Description of change
V0.1	28/03/2019	This is now a joint policy, adapted from the NCUH policy.
V0.2	15/05/19	General amendments

List of Stakeholders who have reviewed the document

Name	Job Title	Date
Kath Hughes	Head of engagement & communications, CPFT	15/04/2019
Laura Irving	Communications officer, CPFT	08/04/2019
Julie Clayton	Head of communications & engagement, NHS North Cumbria CCG	05/04/2019
Wendy Forster	Communications officer, CPFT	05/04/2019
Andrew Butler	Communications advisor, NCUH	04/04/2019
Derrick Bates	Information & Cyber security officer, NCUH	04/04/2019
Yvonne Salkeld	Joint head of information governance	09/04/2019