

Media Relations Policy
ME CCG Policy Reference:
MECCG068

Target Audience	All members of Clinical Commissioning Group staff and other organisations acting on behalf of the Clinical Commissioning Group
Brief Description (max 50 words)	This policy and procedure outlines the function and role of media relations to provide a practical guide for CCG staff. It also seeks to promote positive media coverage and inform the local community about how we are leading the local NHS. It is also there to protect staff and to ensure a coordinated approach to media handling.
Action Required	To be approved by the CCG Board then disseminated to all staff via the staff Intranet and newsletter.

Document Information

Version Number	Version 1.1
Accountable Officer	Director of Corporate Services
Responsible Officer	Head of Communications and Engagement
Date Approved	29 January 2015 (extended for 12 months by Board 26 March 2020)
Approved By	Board
Review Date	March 2022 (Agreed at Audit Committee 23 Feb 2021 to extend the review date for this policy to March 2022)
Stakeholders engaged in development/review	Quality & Governance Committee
Equality Assessment	This document has been assessed for equality impact. The Media Relations Policy is applicable in varying levels to every member of staff within Mid Essex CCG irrespective of their race, ethnic origin, nationality, gender, culture, religion or belief, sexual orientation, age or disability.

Amendment History

Version	Date	Reviewer	Comments
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1.1	October 2014	Rachel Harkes, Head of Communications and Engagement	Reviewed following the transfer of the communications service from the CSU to Mid Essex CCG.
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BACKGROUND

The NHS is constantly under intense media scrutiny, the public has a vested interest in the NHS and its performance. In addition to being a political issue, health is often an emotive one. Whether attracting commendation or controversy it consistently makes headline news.

In the interests of effective media relations, both proactive and reactive, it is important that all staff directly or indirectly associated with Mid Essex Clinical Commissioning Group (CCG), including federations and member practices, adhere to the agreed guidelines set out in this policy when dealing with the media.

Efforts should be made to maintain and develop the CCG's relationship with local and regional media and to improve connections with professional and specialist publications.

INTRODUCTION

1.1 Mid Essex CCG is committed to being accountable and responsive to the needs of patients and the local population; ensuring they are well informed and involved with their local NHS.

Mid Essex CCG is a publicly funded and publicly accountable service. The care and treatment commissioned is subject to public and democratic scrutiny and can attract significant media interest.

This policy outlines the function and role of media relations and provides a practical guide for CCG staff. It also seeks to promote positive media coverage and inform the local community about how we are leading the local NHS. It is also there to protect staff and to ensure a coordinated approach to media handling.

Clear internal arrangements for media relations ensure that the right people are giving the right message at the right time and to the right audiences.

This policy provides a mechanism through which Mid Essex CCG can be effective in media management. It is the responsibility of the Head of Communications and Engagement to ensure this policy is implemented across the CCG.

1.2 Mid Essex CCG aims to create a climate of openness and dialogue with all stakeholders. This policy supports a culture of openness and dialogue in the NHS and also ensures that the reputation of the Mid Essex CCG is protected

and if possible enhanced and that the chances of misrepresentation by the media are reduced. Mid Essex CCG believes that clinical and non-clinical staff should have access to expert knowledge to assist and support them in media management and this policy sets out a framework to provide this support.

2. PURPOSE

- 2.1** Developing good relationships with the press and media is essential. This can help to promote a positive image of our services and can be a valuable source of communication for the communities that we serve.
- 2.2** It is in the best interests of Mid-Essex CCG that all representatives of the press and broadcast media are treated in an open-handed, helpful manner.
- 2.3** In order that our relationships with the press and media are successful, it is vital that our communications are concise, clear and unambiguous. To this end staff will be required to comply with this policy at all times.

3. DEFINITIONS

- 3.1** The policy, when referring to 'the media', is concerned with journalists, researchers, editors and others working for the press in all forms (such as newspapers, radio, television and internet sites)

The policy, when referring to 'lead media officer' is the CCG officer designated responsibility by the Head of Communications and Engagement for dealing with the enquiry.

4. ROLES AND RESPONSIBILITIES

- 4.1** Organisations who work for/with the NHS have a responsibility to the public and the media to provide information on matters about which they may have a legitimate concern. However the overriding principle is that the duty of care and protection of an individual's right to privacy, dignity and confidentiality must come first, on every occasion.
- 4.2** It is the responsibility of Director of Corporate Services to ensure that CCG staff are fully aware of this policy.
- 4.3** The policy applies to all Mid Essex CCG staff

5. POLICY PROCEDURAL REQUIREMENTS

Press and media enquiries

5.1 For the purposes of this policy, a media enquiry will be a request for information received from the following stakeholders:

- Print or broadcast media
- ‘Citizen journalists’ – bloggers
- MPs or local Councillors

Patient-specific enquiries are currently managed by the CCG PALS team

5.2 This may be in response to a story that the CCG has already published proactively, or an issue that has arisen (called a ‘reactive enquiry’).

In addition to a response sent directly to any of the above stakeholders, the following channels are also to be considered ‘mass media’ and are subject to these procedures.

- Mid Essex CCG website
- Social media (for example Twitter, Facebook, blogs)

5.3 Enquiries received from other stakeholders such as activist groups will usually be responded to under the Freedom of Information Act 2004 (to which a different set of procedures apply).

During normal office hours all enquiries from the press or media are to be referred, in the first instance, to the Communications and Engagement team. This arrangement is applicable to all actions by the team and as identified in this policy.

5.4 If approached by the media, Mid Essex CCG staff should not answer any questions on behalf of the CCG and should instead confirm that a member of media team will get back to them as soon as possible. A brief summary of the enquiry along with contact details should be taken and given to the lead media officer who will alert/work with the appropriate senior staff at the CCG.

The only exception to this is on an occasion when it is appropriate for the Head of Communications and Engagement to speak directly with the media.

5.5 The lead media officer will identify a spokesperson on a case-by-case basis. Where appropriate, other staff will be briefed in order to help gather facts or information in relation to the enquiry.

The identified spokesperson will be the ONLY authorised point of contact with the media – any other contact with the media by other staff will be considered as unauthorised and will be treated as such by Mid Essex CCG.

5.6 No member of staff will speak to the media ‘off the record’. The only exception to this is the lead media officer, who in certain circumstances will be required to respond in this way.

- 5.7 Staff giving interviews to the press or media should have received media training, support and advice from the lead media officer.
- 5.8 All staff should ensure they are available *as a matter of urgency* should information be required by the press or media to avoid a negative reputation from being 'unavailable for comment' or worse still 'refused to comment'. This includes staff who have not been media trained, as they will be required to give information for written press statements.
- 5.9 All newspaper media enquiries should have a written response via email. This is particularly important when handling contentious issues to ensure accurate records are kept for future reference (if required).
- 5.10 All press statements will be approved by the relevant lead Director, Accountable Officer or Chair of the CCG. Statements should be issued by the lead media officer who will be the contact for any further enquiries.
- 5.11 A record will be kept of all media enquiries as well as statements/press releases issued by/on behalf of the CCG.
- 5.12 No representative of the media (newspaper or broadcasting) will be allowed access to the CCG without approval by the lead media officer.
- 5.13 Media contact must not detract from the primary purpose of care delivery and the duty of care must not be detrimentally affected by media activity.
- 5.14 Authorised media representatives will be expected to produce proof of identify (i.e. a valid press card) when visiting Mid Essex CCG premises.

News releases

- 5.15 Maximising the opportunities for press coverage of the work of the Mid Essex CCG requires every member of staff to be alert to possible stories and subjects for articles and to let the communications team know about them as soon as possible.
- 5.16 To ensure consistency in our communications all draft news releases should be submitted to the lead media officer for editorial agreement/approval.
- 5.17 All news releases from Mid Essex CCG will be planned, co-ordinated and released through the lead media officer. The content will be cleared with the relevant Director, Accountable Officer or Chair if appropriate, prior to release.
- 5.18 All news releases that refer to partner organisations will not be issued until the approval of the content has been confirmed with their own communications department.

Where appropriate Mid Essex CCG will work with corresponding communications departments/teams to issue joint press releases when required e.g. *Public Health campaigns etc*

- 5.19** No member of staff will make contact with the media without the approval of the relevant Director, Accountable Officer or Chair/the lead media officer.
- 5.20** The lead media officer will maintain a list of press and media to advise on preferred editorial formats, house styles and copy deadlines.
- 5.21** The lead media officer will monitor press coverage and will hold copies of newspaper cuttings for an agreed period of time and can provide advice and support for media briefings and interviews.
- 5.22** Staff are required to meet their obligations with regard to client confidentiality at all times, especially when dealing with media issues.

Serious incidents

- 5.23** Mid Essex CCG is required to inform NHS England Area Team if any serious incident (SI) occurs within the organisation that is likely to involve press or media attention.
- 5.24** Every SI should be reported in accordance with the Quality Team policy using a standard SI report form which should be completed by the relevant member of staff.

The lead media officer should be consulted in terms of the content of the media section of the reporting form.

Social media

- 5.25** If the CCG has a Twitter account and/or Facebook page these will be managed by the Communications and Engagement team.
- 5.26** Tweets/posts cover some or all of the following:
 - Alerts about new content on our digital channels (news, publications, videos on YouTube, publicity campaigns etc)
 - invitations to provide feedback on specific issues on which we are consulting
 - occasional live coverage of events
 - re-tweets of information from stakeholders such as NHS Choices, Ambulance Trust and other organisations as appropriate.
- 5.27** When following @MidEssexCCG or becoming friends with Mid Essex CCG on Facebook, it will not automatically follow you back. This is to discourage the use of direct messaging, avoid resource wasting spam handling and so

that you can easily identify other key Twitter/Facebook users that we think are relevant and who you wish to follow. However, being 'followed by' or being 'friends of' Mid Essex CCG does not imply endorsement of any kind.

5.28 The Communications and Engagement team will update and monitor the Twitter/Facebook account during office hours (Monday to Friday). Occasionally the Twitter/Facebook accounts will be updated out of hours if it is being used to cover specific or major events.

5.29 Feedback and ideas from all followers are welcomed and the Communications and Engagement team will endeavour to join conversations where possible. It may not be possible to reply to all messages received.

The Communications and Engagement team will read all @replies and direct messages to ensure that any emerging themes or helpful suggestions are passed to relevant people within the CCG.

There should be no engagement on issues of party politics.

The usual way of contacting the CCG for official correspondence will be detailed in the 'Contact us' section of the CCG website.

Whistleblowing

5.30 If staff have concerns they are expected to adhere to the CCG's 'whistleblowing policy' and should either raise matters internally or contact independent regulators (or relevant professional bodies).

Staff should not raise their concerns with press, radio, television or other media organisations without first seeking permission from the relevant Director, Accountable Officer or Chair to do so. Ignoring this may be a breach of the Code of Conduct and/or may mean that the CCG is less able to protect the individual from any adverse consequences.

Major incidents

5.31 Mid Essex CCG Major Incident Plan will detail the role of communications in the event of a major incident and special arrangements for liaising with the media are detailed in the plan.

Out of hours enquiries

- 5.32** The Communications and Engagement team are generally available to deal with press enquiries Monday to Friday; 0800 to 1800 (not including Bank Holidays).
- 5.33** Out of hours media enquiries will be routed to the Head of Communications and Engagement who, if appropriate, will contact the On-Call Director.

Rights of staff side representatives of recognised Trade Unions or staff associations.

- 5.34** This policy does not restrict the right of elected staff side representatives of recognised trade unions or staff associations to express their views to the media directly.
- 5.35** Elected staff side representatives of recognised trade unions or staff associates are fully entitled to make comments on behalf of their staff association or trade union. **They are not able to make comments on behalf of or represent the views of Mid Essex CCG.**

Training

- 5.36** The lead media officer, in agreement with the Head of Communications and Engagement, will ensure that training and/or coaching on effective media relations is available to staff.

6.0 MONITORING COMPLIANCE

- 6.1** This policy will be implemented by the Director of Corporate Services
- 6.2** The Policy will be circulated to all CCG staff and held electronically by the CCG (and if applicable, also held on the intranet and website for the CCG)
- 6.3** Monitoring of compliance of this policy will be undertaken as part of the routine monitoring undertaken by the Communications and Engagement team of all local media reports.

Any infringements of this policy identified via this route, will be dealt with in the first instance, by the relevant Director, Accountable Officer or Chair.

- 6.4** This policy will be reviewed at least every year and will be amended should legislation or a change in national or local policy occur.

7.0 ASSOCIATED DOCUMENTATION

Policy Ref: MECCG068
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- 7.1 CCG Media Protocol: Quick guide with advice, tips and consent form
- MECCG14 - Serious Incident Management Policy
- MECCG80 - Communications and Engagement Strategy
- CCG Major Incident Plan
- CCG Whistleblowing Policy

LIST OF STAKEHOLDERS CONSULTED

Date Sent	Name of individual Or Group	Designation	Were comments received, considered and incorporated Yes/No	If not incorporated record the reason why	No comments received from individual/ Group
October 2014	Viv Barnes	Director of Corporate Services	Yes		

Mid Essex Clinical Commissioning Group

MEDIA PROTOCOL - QUICK GUIDE WITH ADVICE AND TIPS

This protocol is to provide CCG staff with guidance, tips and advice about effective and successful media engagement and media management. It should be read in conjunction with the Mid Essex CCG Media Policy.

'GOLDEN RULES' TO REMEMBER...

Requests for criticisms of other organisations or individuals

We do not make criticisms of organisations or individuals. In certain circumstances we may criticise alleged behaviour or an organisational or individual position, but we separate this from a criticism of the organisation or individual.

Requests for confirmation of patient identity

We do not confirm a patient's identity, treatment or other clinical or personal details, even if they themselves have volunteered these to the media.

We will never refuse to comment or say 'no comment'

Even if the deadline is too short to investigate the enquiry thoroughly, we will issue our broad position on an issue, or appropriate process or policy as a 'holding statement' ahead of the requestor's deadline.

We will refute incorrect reporting

This will involve a letter to the editor requesting a correction is made. If this information has been provided erroneously by an internal source or public document, we will explain that the information is inaccurate and will correct it.

We will also use our own channels to publish correct information, where there is serious risk to organisational reputation or the integrity of our services. However this must be undertaken with caution to avoid ostracising a media outlet or getting into a 'tit-for-tat' exchange.

ADVICE

LOCAL AWARENESS: HORIZON SCANNING – BE FOREWARNED!

While it is impossible to be forewarned about a media issue or line of enquiry, good issues management and horizon-scanning will help the CCG to be prepared and respond most effectively to issues of contention. It is important to monitor issues and agree preliminary lines to take (such as key messages about the CCG's position) and seek factual details to support the CCG's response.

CCG representatives should support this by:

- Notifying the lead media officer of any SI's or adverse customer/patient experience incidents, particularly if a formal complaint is anticipated.
- Sending good news stories on positive developments, awards, innovation and good practice and examples of patient satisfaction to the lead media officer.
- Capturing patient case studies and stories as part of new service development.

CCG's: ALWAYS EXERCISE YOUR 'RIGHT TO REPLY'

The CCG should always exercise its 'right to reply' to media stories if appropriate (although the right to reply is not legally enforceable, it is universally accepted by media as good practice to grant people the opportunity to comment on issues affecting/implicating them).

PROMOTING YOUR NEWS

The CCG should always look for opportunities to promote their positive news. Doing this proactively develops stakeholders' understanding of our business, what we are trying to achieve and why. It is also a cost effective way to release factual information (without having to pay for advertising) or announcements (for example; publicising opening times of services during holiday periods).

TIPS

Copyright – legal implications

Items such as photographs, video, written word, designs and sound recordings have copyright protection. Staff should not use photographs from the internet or any unauthorised sources, as most uses of copyrighted materials require permission from the copyright owner. Using resources without permission could potentially see the CCG facing legal action for infringement of copyright.

Photo/filming consent form

If you take photos or visual recordings of patients or members of the public, you must ensure they sign a 'consent form' (which should be retained on file) to ensure you have permission to use their image in publications, news stories, etc.

Writing effective media releases

- Keep it short - aim for one side of A4 - and keep to the facts.
- Tell the whole story in the first paragraph - who, what, when, where, why and how – this is what will hook the journalist/blogger/researcher.
- Never use a metaphor, simile or other figure of speech which you are used to seeing in print (i.e. avoid clichés)
- Never use a long word when a short word will do (i.e. don't be pretentious)
- If it is possible to cut out a word, always do so (i.e. edit, edit, edit)
- Never use jargon, a scientific word or a foreign phrase if there is a straightforward English equivalent
- Include technical information and explanations in 'editors' notes'.

PHOTO/FILMING CONSENT FORM

PLEASE TICK APPROPRIATE BOXES BELOW TO INDICATE YOUR APPROVAL.

I, the undersigned agree that my / my child's photograph may be used for a range of media (for example: newspapers, newsletters, magazines, television, and websites).

I have been given a full explanation about possible uses of my *(insert)*

We will not disclose any photographs or information about you without your consent, unless we have a statutory duty to do so in preventing harm to someone else, or to protect you or to prevent or detect crime

We will only store and use information in accordance with registration under the Data Protection Act 1998

Photograph Name (in caption) Film Footage

I therefore understand that my:

Photograph Name in caption Film Footage

may be used for legitimate purposes i.e. (Annual Reports, website, and exhibitions to promote the work of Mid-Essex CCG Clinical Commissioning Group both now and in the future.

I also understand that my:

Photograph Name in caption Film Footage

may be used by a range of media titles in press articles/TV broadcasts / websites which are seen by the general public, now and in the future.

I hereby grant consent, freely given, to the use of my

Photograph Name in caption Film Footage

Name (Please print)

Name of child (if applicable).....

Signature:

Date:

