

Media Policy

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Record of Changes

Date	Version	Page	Amendment
22/02/2024	2		New document

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1. Overview and Introduction

This document sets out NHS Highland policy for working with the media, including roles, responsibilities and procedures. It gives a broad corporate framework to guide staff in developing a positive two-way relationship with the media.

Public and stakeholder confidence in NHS Highland is dependent on effective stakeholder engagement. The media shapes public opinion and is therefore a key stakeholder for our organisation. NHS Highland engages the media reactively in response to media enquiries and proactively to tell the organisation's story and to share important messages with the public: e.g. in relation to public health messages during the Coronavirus pandemic.

2. Scope

This policy applies to all NHS Highland staff. Agency staff, consultants, bank workers and contractors are required to comply with standards outlined in this policy while they are working for NHS Highland.

3. Background

Media engagement which has not followed our media policy has the potential to create public confusion and damage our reputation, including damaging our working relationships with journalists.

Good media relations are built on a framework of robust governance which enables our organisation to respond to media enquiries with accurate information supported by appropriate contextual details and provided within agreed timescales. Planned proactive engagement also enables our organisation to talk publicly about the role of NHS Highland and Argyll and Bute HSCP. Proactive media engagement usually relates to key decisions by our Board, improvements to services and other information which our communities are likely to find helpful, so the timing of proactive media engagement activities is important.

4. Definitions

The media includes local, regional, national and specialist press, television, radio, digital media and social media channels. NHS Highland has a separate Social Media Policy. Social media as it relates to this Media Policy is concerned primarily with the social media output of conventional media outlets, for example the Facebook and Twitter accounts of local papers. The primary focus is on the local and regional broadcast, print media and social media, although there will be opportunities to raise NHS Highlands profile at a national level.

5. Main Body of the Document

5.1 Key principles

Our key principles when dealing with the media are:-

- To meet the communications objectives set out in NHS Highland's Communications and Engagement Strategy.

- To use appropriate media to reach target audiences as set out in the Communications and Engagement Annual Action Plan.
- To develop positive, pro-active, two-way relationships with the media.
- To respond to all media enquiries quickly, efficiently and within a realistic target deadline.
- To gain positive media coverage of NHS Highland services, activities and events.
- To rebut false or inaccurate information
- To track and evaluate media coverage relating to NHS Highland

5.2 Liaison with other NHS organisations

NHSScotland holds a circulation list of national and territorial board communications leads as well as Scottish Government NHS Recovery, Health and Social Care media team.

NHS Highland will notify NHSScotland and the Scottish Government of reactive or potentially significant media issues and ensure timely and accurate briefings as requested.

Other NHS Highland partner organisation's communications leads, such as the Health and Social Care Partnership, Highland/Argyll and Bute Council should be contacted if appropriate, for example, where an activity or incident may have an impact on them.

Copies of media statements should be copied to partner organisations for information.

5.2 Procedure

5.2.1 Responding to enquiries

All media enquiries, responses issued and the source of information are logged by the communications team.

A record is made of the reporter's name, organisation, date and time of query, nature of enquiry, communications manager dealing with query, response made, date and time of response and which senior manager was consulted.

The log enables co-ordinated responses to be issued to enquiries on similar subjects, issue management, and facilitates media monitoring.

Once the enquiries are logged the appropriate members of staff are contacted and a response prepared.

When the information has been agreed and signed off by the Chief Executive or their nominated representative, the communications team will respond to the enquiry directly.

Statements are emailed to media outlets, this supports any further follow up action/ rebuttal if required.

There may be occasions, on matters of a minor nature, where the communications team responds directly to the media without further consultation.

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

Every effort will be made to meet the media deadline wherever possible i.e. within a working day or as soon as possible thereafter.

5.2.2 Responding to requests for interviews on receiving a request for comment or interview

The communications team will contact the appropriate member of staff for more information and co-ordinate and agree a response or make interview arrangements with the relevant Director/Associate Director.

As a general rule only the Chief Executive, Directors, Associate Directors, NHS Highland Board Chair and other heads of service will be asked to undertake radio/TV broadcast or press interviews.

This will, however, depend on the subject matter and the decision of the relevant Director. It may be more appropriate for another member of staff with more relevant experience and knowledge to undertake an interview.

The communications team will make appropriate interview arrangements and help with preparations and briefings. Where possible, the communications manager or other manager should sit in on the interview.

Where a request is made to interview a service user or carer their permission must be gained before reporters are granted access.

Colleagues who are approached for media involvement should only do so having first sought and approved permission from the NHS Highland communications team. This is with regards to any enquiry that has a connection to their role in NHS Highland.

5.2.3 Dealing with negative issues associated with NHS Highland

Dealing with negative issues associated with NHS Highland can often involve complex and confidential matters that can have a direct impact on service users, carers and the general public.

Quite understandably such issues are often in the domain of public interest and as such can attract considerable media scrutiny, both negative and positive.

If and when mistakes are made, or controversial decisions 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.

A well-managed response to the media not only reduces tension it can also promote a positive image to the outside world.

5.2.4 Making/issuing rebuttal statements

The communications team will scan media for both misinformation and attacks on NHS Highland, which could be damaging to the organisation's reputation.

Where these are felt to be unjustified or where untruths have been printed or facts interpreted wrongly, appropriate members of staff will be consulted and a rebuttal statement

issued, if and where deemed appropriate. However, it is important to note that a rebuttal may not be possible if a new report is factually accurate, even if the tone is felt to be misleading.

5.2.5 Producing media releases

While the communications team increasingly uses direct methods of reaching our audiences, media releases remain a commonly used tool in securing media coverage. Releases are issued by the communications team to provide information on incidents, events, achievements, plans etc. All releases should be approved by the Chief Executive or the Head of Communications and Engagement.

A record of all media releases issued is kept on file.

Media releases are issued in a standard format and NHS Highland headed Press Release template.

The main areas of format include-

- Date of release
- Title (the journalist will usually change the heading)
- 1.0 line spacing
- Arial font point 11
- Left justified text
- [ENDS] at the end of the release
- Issued by: communications manager's contact information.

The following tips on content are usually applied-

- Use of the 5 'W's - 'who, what, why, when and where' - use of simple English in short sentences and paragraphs. (The first paragraph should ideally be no more than 25 words long)
- The key parts of the story should be at the top of the release
- A release could be cut after any paragraph by the newspaper Editor
- Combine 'what the media want to know' with 'what we need to tell them'
- Try to keep to one side of A4 (1.0 spacing)
- The shorter the better
- Quotes are important and should be included in a press release to reinforce a point. They are usually included in the 3rd paragraph and sometimes again at the end of the press release
- Technical and other data - if essential - can be given in a separate 'Note to Editors'

5.2.6 Use of quotes

Generally speaking quotes in media releases will only be given by the relevant Director/ Associate Director, Board Chair or appropriate Head of Service. Depending on the nature of the release, partner organisations may also be quoted.

Non-Executive Members will not be quoted unless clearance is given by the Chief Executive/Chair.

All quotes will be agreed as necessary prior to issue.

5.2.7 Distribution of media releases

- Key media releases should be distributed to staff first if the information is relevant and appropriate
- Media releases are distributed by e-mail to targeted media contacts on the NHS Highland media distribution list
- The distribution list includes all local press, radio and TV contacts
- Selected releases are also sent to targeted magazines/journals as requested
- Releases are distributed in-house to Chief Executive, Chair, Executive Team in order to keep them updated with events
- All releases are also available on the NHS Highland website for at least 1 year after release
- All releases are included in the media update which is distributed to senior NHS Highland managers on a daily basis (Mon-Fri.)

5.2.8 Monitoring media release coverage

The communications team use a daily media monitoring service to keep track of how and where releases and other content have been used by the media and general coverage of NHS Highland. This daily round-up covers national, local and regional print media and is circulated to senior Executive Directors on a daily basis (Mon-Fri) with the weekend coverage circulated on a Monday.

5.2.9 Photography

A photograph can greatly enhance publicity by drawing the reader's eye and increasing the amount of space given to a story. NHS Highland's communications team can take photographs to issue with any media release, subject to the team's availability and appropriate permissions forms being signed by those featured in the photo. Copyright of the image is retained by NHS Highland and media outlets are requested to attribute the photo to NHS Highland. Should communications team members not be available then another colleague can provide a photo.

5.2.10 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.

5.2.11 Photocopying articles

A licence is needed to photocopy articles from national and some local papers and journals. NHS Highland has an annual licence agreement with NLA. Please contact the communications team for more information before copying or distributing any articles.

5.2.12 Patient/staff confidentiality

The Caldicott Committee was set up to review the passing of service user information from the NHS to other non-NHS bodies, to ensure that the service user's right to confidentiality was maintained at all times.

Under normal circumstances there will be no basis for disclosure of service user information to the media.

Comment will not be made in response to media enquiries on individual cases that may breach the individual's statutory rights to confidentiality or NHS Highland's statutory rights to maintain it even though the individual may be named in the enquiry or reported by the media.

The following general principles MUST be followed when dealing with enquiries about specific individuals from the media.

- The duty of care and protection of the service user's right to privacy, dignity, confidentiality and respect within the NHS as a good employer must come first on every occasion
- Staff also have a right to confidentiality and respect which the NHS as a good employer has to honour
- No pressure may be put on either service users or staff to participate in media activity
- Reporters and photographers must ask for permission before entering NHS Highland property
- Any service user interviewed must be well enough and have given his or her informed consent

5.2.13 Organising media conferences/special events/launches/photocalls

Generally, media conferences should only be used for fairly major events, 'firsts' or when a media release will not suffice, e.g. launching a major facility or initiative, updating during a major incident, following the publication of the results of an inquiry, or explaining complex issues such as major budget changes.

The Communications team can advise and assist in the preparation and organisation of press activity: e.g. conference, photo opportunity, launch event.

At least four weeks' notice should be given of any event or initiative for which advance publicity is required. This is in order to meet the deadlines of weekly papers and for effective management of logistics: e.g. invitations.

5.2.14 Crisis Management

There may be situations which produce significant media interest such as a major incident or public health issue. These situations need careful management.

In the case of a major incident, the communications team will usually be part of any Incident Management Team (IMT). Media enquiries will be dealt with in liaison with the relevant staff and releases will be issued as appropriate.

In the event of a major disaster or emergency situation the Police and emergency services will generally provide the initial lead in handling the media. After the first few hours the lead may switch to the relevant local authority or resilience team.

NHS Highland may be required to help in co-ordinating, supplying or agreeing content. It is essential that if asked the NHS Highland responds as quickly as possible.

Refer to NHS Highland Major Incident / Resilience Plans for further advice about handling the media in the event of a major incident.

5.2.15 Archiving Arrangements

The communications team is responsible for maintaining a log of all media enquiries and statements issued as well as media coverage of NHS Highland.

6. Roles and Responsibilities

The NHS Highland Communications and Engagement team is the first point of contact for all media enquiries.

The main responsibilities of the communications team when dealing with the media are to:

- Act as the first point of contact for media enquiries.
- Research and feedback responses in consultation with appropriate members of staff.
- Produce media releases as and when appropriate
- Brief and prepare colleagues who are required to speak to the media.
- Supervise the media whilst on NHS Highland premises.
- Communicate potential or actual media coverage to the Chief Executive, Executive Directors Group, NHS Highland Board Chair, other NHS Highland staff and other interested parties, such as the Scottish Government as and when appropriate.
- Brief the Executive on-call of issues, which may cause media interest out of hours, wherever possible.

6.1 All NHS Highland staff within office hours

Any member of staff receiving a request for comment or interview from the media about any aspect of service delivery should refer all such enquiries to the NHS Highland communications team by asking the Switchboard to put them through to the on-call Communications Manager, or by emailing nhsh.nhshcommunications@nhs.scot (please note this email is only checked during working hours).

6.2 Out of hours

Any member of staff contacted by the media out of normal office hours is requested to direct the caller to Raigmore Hospital Switchboard on 01463 704000 for the attention of the on call Communications Manager. This would also include any urgent enquiries, for example, a Major Incident.

6.3 All staff are also asked to:

- Inform the NHS Highland communications team either directly or through their line manager of incidents, which may result in media interest

It may be hard to decide which incidents may attract media interest. Where possible advance notice should be given to the communications team so that any preliminary NHS Highland response or reaction can be considered before the media contacts NHS Highland

- Make the communications team aware of positive news stories including events and achievements

Supply background information to help the communications team respond to any enquiries received as a result of a media release. Assist in the production of media statements or other content at the request of the communications team.

6.4 Chief Executive and Executive Directors

The main responsibilities of the Chief Executive and Executive Directors are to:

- Assist in the drafting of media statements as appropriate
- Be responsible for planning for and engaging with communications activity for their areas
- Helping secure key messaging from experts in their teams where appropriate.
- To approve statements or releases to the media as appropriate and within a requested deadline
- To act as a spokesperson or have media release quotes attributed to them.

Each media enquiry will be judged accordingly by the Communications and Engagement team in relation to strategic goals, business need or reputational risk and a recommendation made as to the level and speed of response required

6.5 On-call Communications Manager

The On-call Communications Manager will deal with those media enquiries received outside normal office hours and which cannot wait until the next working day.

Any statement provided to the media should be recorded for logging purposes and to assist with any further enquiries.

6.6 Switchboard/reception staff

All media calls should be transferred to the communications team in office hours and to the on-call Communications Manager via the Raigmore Switchboard out of hours where the enquiry cannot wait until the next working day.

7. Monitoring Compliance and Effectiveness

Monitoring of the effectiveness of this procedure will be undertaken by the Head of Communications and Engagement.

8. Consultation Details and Communication Plan

Consultation: List persons / group(s) included in consultation. Indicate whether feedback used / received and no suggested changes (FU), not used (FNU) or not received (NR).

Name/s of person or group	State which corporate services/staff groups the person or group represents	Date	Response: FU/FNU/NR
Communications and Engagement Team	Communications and Engagement Team	May 2023	FU
Listening and Learning Panel	Cross-section of staff groups	May-June 2023	NR
People and Culture	People and Culture SLT	28 July	NR

SLT		2023	
HR Sub Committee	Staff, including HR colleagues and Staffside	7 December 2023	NR
Area Partnership Forum	Staff, including HR colleagues and Staffside	16 February 2024	NR

Communication plan:

The updated policy will replace the previous version on the intranet, in both the policy library and the Communications and Engagement Team page. An article will be included in the Weekly Round Up reminding staff of the policy.

9. References and Associated documents

Associated Documents

[Equalities Impact Assessment](#)