MEDIA AND SOCIAL MEDIA POLICY

Department / Service:	Communications
Originator:	Director of Communications and Engagement
Accountable Director:	Director of Communications and Engagement
Approved by:	JNCC
Date of first approval:	8th March 2016
Initial Expiry Date:	8th March 2018
Review date:	8th March 2018
New Expiry Date:	8th March 2020
Target Organisation(s)	Worcestershire Acute Hospitals NHS Trust
Target Departments	All Departments
Target staff categories	All Staff

Policy Overview:

Worcestershire Acute Hospitals NHS Trust (WAHT) works with the media and uses social media to provide opportunities for genuine, open, honest and transparent engagement with stakeholders, giving them a chance to have up-to-date accurate information about the Trust and its services and participate and influence decision making.

The purpose of this Policy is to help protect the organisation and its employees; deliver against the Trust's open and transparent ethos; ensure that comment is based on facts; and ensure that the population the Trust serves is aware of the services provided and how to access them.

It seeks to protect staff interests and to advise employees of the potential consequences of their behaviour and any content that they might provide to the media or post online, whether acting independently or in their capacity as a representative of WAHT.

Key amendments to this Document:

Date	Amendment	By:
March 2018	Review of Policy by new Director to ensure still fit for purpose	Becky Bourne/ Richard Haynes

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1. INTRODUCTION

Worcestershire Acute Hospitals NHS Trust (WAHT) has a duty to be accountable and open about its performance, decisions, policies and actions, and ensure that the highest possible standards are maintained. Communicating effectively with print, online and broadcast media is a vital part of this openness, whilst at the same time allowing the Trust to promote and protect the reputation of the hospitals.

Positive media coverage can have a powerful impact on staff, patients and local people, as it creates a positive profile of the organisation, increases public understanding and boosts the morale of staff and volunteers. Conversely, negative media coverage can damage staff morale and can worry and concern our patients. It is therefore vital that all Trust communication with the press is well-managed, consistent and monitored.

Social media' or 'social networking' are the terms commonly used to describe websites and online tools which allow users to interact with each other in some way by sharing information, opinions, knowledge and interests.

WAHT uses social media to provide opportunities for genuine, open, honest and transparent engagement with stakeholders, giving them a chance to participate and influence decision making. These tools are used to build online communities and networks.

The purpose of this Policy is to help protect the organisation, but also to protect staff interests and to advise employees of the potential consequences of their behaviour and any content that they might provide to the media or post online, whether acting independently or in their capacity as a representative of WAHT.

2. SCOPE

The purpose of this policy is to provide guidance to all WAHT staff on traditional media and social media/networking. This includes the internet and the external use of other online tools such as blogs, discussion forums and interactive news sites. It seeks to give direction to staff, in the use of these tools and help them to understand the ways they can utilise all forms of the media to help achieve business goals. This is a rapidly changing area and this Policy is expected to be updated and amended as our communication strategies evolve.

The Trust aims to maintain and build upon effective relationships with media locally, nationally and internationally, and continue to keep members of the public and staff informed of the achievements and challenges of the organisation. The Trust is committed to providing staff with support for media issues at all times, and protecting staff and patients from inappropriate media intrusion.

This Policy aims to ensure that the Trust t:

- pplies a consistent approach to media relations and cost-effectively utilises the most suitable and effective media vehicles (i.e. securing coverage wherever appropriate) for publicising its services and achievements.

- Utilises the appropriate media to maintain effective relations with stakeholders and to communicate with patients, and their families with clarity and consistency.

- Is represented fairly in the media, with any inaccuracies or imbalances challenged and amended at the earliest opportunity.

- Provides clarity to staff on the use of the media including social media tools when acting independently or as a representative of WAHT and give them the confidence to engage effectively.

- Ensures that the organisation's or an individual's reputation is not brought into disrepute and that it is not exposed to legal risk; and

- Ensures that internet users are able to distinguish official corporate WAHT information from the personal opinion of staff.

3. Responsibility and Duties

Overall responsibility for this Policy rests with the Trust Board. The lead Executive Director for this Policy is the Director of Communications and Engagement.

3.1 Executive Directors will be responsible for ensuring that:

- All employees are informed of the existence of this Policy.

- The Policy is implemented and operated effectively within their directorate; and

- Managerial action is sympathetic, fair and equitable and is monitored effectively.

3.2 The Director of Communications and Engagement will be responsible for ensuring that:

- Processes and procedures are in place for the effective handling of all media issues.

- A balanced view of the Trust is given and presented.

- Misreporting and misrepresentation is addressed.

- Media training and support is provided to senior members of the Trust who are asked to represent the Trust.

3.3 Communications Team will be responsible for ensuring that:

- All media-related issues – whether a member of staff has been approached by a journalist or would like to approach the press with a story – are managed appropriately.

- Staff and patient confidentiality is maintained when liaising with the media and patients, staff and the organisation as a whole are represented fairly.

- Staff and visitors are protected from unwanted media intrusion.

- Positive news stories are given maximum publicity.

- Potentially damaging issues are handled with sensitivity and care.

- A strong working relationship with local media, clinical commissioning groups, health partners, Trade Unions, NHSI, NHS England and the Department of Health is maintained.

3.4 All managers with staff management responsibility should:

- Make staff aware of this policy.

- Ensure good and open communication with staff, particularly where there are organisational and procedural changes.

- Ensure that staff are fully trained to discharge their duties and are provided with meaningful development opportunities.

- Ensure that bullying and harassment is not tolerated.

- Promptly investigate any reported incidents.

3.5 Employees

Having positive working relationships builds resilience and wellbeing within staff. It is expected that all Trust staff will ensure that they do not publish posts on social media which may be offensive to colleagues, patients or bring the Trust's reputation or the reputation of any Partnership organisation into disrepute.

All staff should familiarise themselves with this Policy.

3.6 Human Resources

HR advisors can help, as an internal resource in the Trust, by advising managers and supporting staff members who feel that they are experiencing difficulties as a result of a colleague's posts on social media. This will include advice with regards to application of the Freedom to Speak Up Policy, Disciplinary Policy, Grievance Policy, or dignity at work policies.

3.7 Trade Unions

- Advising and supporting their members regarding the application of this and other relevant policies.

- Trade Union representatives, with support from their Full Time Office, have the right to act as spokes people for their professional association or Trade Union.

3.8 Freedom to Speak Up Guardian and Champions

- The FTSU Guardian is responsible for ensuring that the Trust promotes an open culture where all staff feel empowered to speak up when they have concerns which may be a matter of public interest.

- The Guardian will ensure that concerns are managed effectively through this policy in a timely way and that all necessary reporting is carried out.

- The Guardian will also ensure that the Trust Board is kept informed of matters and will link in with the National Guardians Office to support the wider Freedom to Speak Up movement in the NHS.

- Freedom to Speak Up Champions will signpost staff to the appropriate department for support.

4. POLICY DETAILS

4.1 Media enquires

All media enquiries of any kind in relation to Worcestershire Acute Hospitals NHS Trust will be handled by the Trust's communications team. The communications team can be contacted:

- During normal working hours, telephone: 01905 760453 or internally on ext: 30580 email: wah-tr.Communications@nhs.net
- For urgent matters that need to be dealt with outside of normal office hours the first point of contact should be the director on call via the switchboard

No member of staff should enter into discussions with journalists on behalf of WAHT without prior contact with the communications team. This applies equally to contact received by phone, email or in person at NHS premises and to approaches made at events or meetings. This includes condition checks (journalists often call to find out the current status of a patient admitted to hospital following an accident/condition that has previously been mentioned in press).

If a member of staff is contacted by anyone from the media, whether a newspaper, television company, radio station, web-based news site or other news organisation, the journalist should be redirected to the communications team. This is usual practice and the journalist will not be surprised if asked to speak to the communications team as a first point of contact.

Staff should remain vigilant to media approaches at all times in order to protect patient confidentiality. Some journalists may contact wards or individuals directly. NHS staff have a legal duty to protect patient confidentiality and privacy and ensure that the information held on patients does not fall into the wrong hands.

The communications team will agree with the journalist what information they require from the Trust and will then liaise with the relevant members of staff to finalise the information to be provided. This process will be managed by the communications team.

If staff are contacted by the communications team for information, they should respond to the communications team and not respond directly to the journalist.

If it is appropriate for an interview to be arranged as a result of the media enquiry, this will be handled by the communications team. They will agree with the relevant director(s) or senior managers who would be the most appropriate person to be interviewed.

4.2 Preparing for possible media interest

In order to effectively prepare for media queries, the communications team must be told at the earliest possible opportunity about any issue (positive or negative) which could lead directly, or indirectly, to media interest.

This might include serious incidents, complex complaints, enquiries from MPs or local councillors, or staffing issues which might reach the public domain via tribunal or union action.

All information provided will be held in the strictest confidence by the communications team.

4.3 Speaking to the media

Staff members have the right to make their personal views known to the media if they wish and they have the right to act as spokespeople for professional associations or trades unions of which they are a member.

However, staff who are speaking to the media in a private capacity, or as a representative of a professional body or organisation, should explain that they are speaking personally or on behalf of the body they are representing, not of the Trust.

It is important that members of staff who choose to comment either in this capacity, or as individuals, should recognise that their comments may have a bearing on the reputation of the Trust.

Staff who comment on any issue in a private capacity should not be interviewed on Trust premises or in uniform. If writing a letter on any issue in a private capacity staff should use their home address and not in any way represent their comments as the Trust's view.

Staff planning to make comment through the media, in aprivate or professional capacity, using the Trust's name, or discussing one of the hospitals, should always contact the communications team in advance of doing so. In addition, the communications team should always be alerted to any query of this kind as it may result in further publicity or media calls.

Staff should not, while speaking to the media on behalf of the Trust, confuse the views of the Trust with their own personal or political views. The communications

team is responsible for coordinating any staff interaction with the media and will provide a comprehensive brief to official Trust spokespeople prior to interview.

If the professional press (e.g. BMJ, Nursing Times, Nursing Standard, or HSJ) contact staff direct, they should refer the call to the communications team in the first instance. The team will coordinate any appropriate response to the journalist and may be able to achieve further positive local media coverage to follow the specialist article.

Journalists sometimes seek conflict between public sector bodies. Staff should avoid criticising other NHS organisations to the media. If a journalist asks about an issue, which has implications for another NHS organisation, please contact a member of the communications team who can work with other organisations to develop a coordinated response.

4.4 Participating in Online Activity

Our staff are our best ambassadors. Many already use social media, interactive and collaborative websites and tools, both in a personal and professional capacity.

Rather than try to restrict this activity, WAHT wishes to embrace it as an element of our commitment to a culture of openness. The communication team will provide guidance and training to empower staff to interact online in a way that is credible, consistent, transparent and relevant.

We recognise that there is an increasingly blurred line between what was previously considered 'corporate social networking', which could be useful to the business, and 'social networking', which is for personal use, to an extent where it may no longer be possible, or desirable, to make that distinction. For example, most people maintain just one Twitter account, which is used to post a mixture of business related and personal content.

However, posts made through personal accounts that are public can be seen, and may breach Trust policy if they bring the Trust into disrepute. This includes situations when a member of staff could be identifiable as a WAHT employee whilst using social networking tools or occasions when they may be commenting on NHS related matters in a public forum.

Staff should use their own discretion and common sense when engaging in online communication. The following guidance gives some general rules and best practice which staff should abide by at all times:

Know and follow WAHT's Standards of Business Conduct (which can be found on the staff intranet). The same principles and guidelines that apply to staff activities in general also apply to online activities. This includes forms of online publishing and discussion, including blogs, wikis, file-sharing, user-generated video and audio, virtual worlds and social networks.

- Know and follow any guidance from professional associations/regulatory bodies (e.g. GMC, NMC, RCN).

- A member of staff is personally responsible for the content they publish on blogs, wikis or any other form of user-generated media. Whatever is published will be public for a long time. When online, staff are advised to use the same principles and standards that they would apply to communicating in other media with people they do not know - if you would not say something in person, on an email or formal letter, do not say it online.

- Employees should identify themselves by giving their name and, when relevant, role at WAHT if discussing WAHT or WAHT related matters. Staff should make it clear that they are speaking for themselves and not on behalf of WAHT. Staff must not use the organisation's logo on personal web pages or social media accounts.

- Employees should be aware that people who join networks and participate in groups may be colleagues, clients, journalists or suppliers. It is also possible that people may not be who they say they are and this should be borne in mind when participating in online activities.

- If a member of staff publishes content to any website outside of WAHT that could be perceived to have a connection to the work they do or subjects associated with WAHT, they should display a disclaimer such as this: "My postings on this site reflect my personal views and don't necessarily represent the positions, strategies or opinions of my employer."

- Respect copyright, fair use, data protection, defamation, libel and financial disclosure laws. Do not reveal confidential information about patients, staff, or the organisation. Never post any information that can be used to identify a patient's identity or health condition in any way as this is a breach of the Data Protection Act.

- Do not use social media in any way to criticise or abuse colleagues, patients or anyone else

- Do not provide WAHT's confidential information on external websites.

- Do not cite or reference partners or suppliers.

- Respect the audience. Do not use personal insults, obscenities, or engage in any conduct that would not be acceptable in the workplace. Staff should also show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory, such as politics, culture and religion.

- Staff should always be aware of their association with WAHT when using online social networks. If a member of staff identifies themselves, or are identifiable as an employee of the organisation, they must ensure that their profile and related content is consistent with how they wish to present themselves to colleagues and stakeholders.

- Staff should be aware that they may be identified as an employee by any public use of their NHSmail email address; If a member of staff is asked to blog or participate in a social network for commercial or personal gain, then this could constitute a conflict of interest (see "Related policies and information" section of this document).

- Staff should refrain from entering any online social networking activity for commercial gain; if someone from the media contacts a member of staff about posts they have made, that member of staff is to contact the communications team.

- Staff are advised of the general principles - do not pick fights, be the first to correct your own mistakes, and do not change previous posts without indicating that you have done so.

- Do not use social media to 'whistleblow' without already having raised concerns through the proper channels. All staff should be aware that the Public Interest Disclosure Act 1998 gives legal protection to employees who wish to whistleblow any concerns. Full details are included in the Freedom to Speak Up Policy.

If any member of staff has any concerns about any of the issues covered by this Policy they should contact the communications team – they are there to help all staff and ensure that those wanting to use social media make the most of the opportunity.

Staff are reminded that use of WAHT equipment and networks to participate in social media activities during their own time is covered by the Internet and Email Access Policy which is available on the Intranet.

4.5 Personal Blogs

If a member of staff is writing a personal blog, they should adhere to the guidance given above if the blog touches on any work related matters. They must also include a disclaimer which says:

> "Any views expressed in this blog are entirely my own and not those of my employer."

4.6 References and Endorsements

For social networking sites such as LinkedIn where personal and professional references are the focus: If a member of staff is representing themselves as a WAHT employee, they must not provide professional references about any current or former employee, worker or contractorthe statements made and information provided in the reference are factually accurate; and

- it should include the disclaimer below:

"This reference is being made by me in a personal capacity. It is not intended and should not be construed as a reference from my employer."

4.7 Responding to the Media

As an organisation, we do not encourage staff to engage in 'unofficial', spontaneous exchanges in response to published media comment, or less traditional forms of journalistic content e.g. blogs. If a member of staff intends to do so, they must not identify themselves as a WAHT employee and make it clear that they are speaking for themselves. Wherever possible the following disclaimer is to be included:

"These views are entirely my own and not necessarily those of my employer."

If a member of staff reads something online that they feel is factually incorrect, inaccurate or otherwise needs an official response from WAHT, the matter should be reported to the communications team.

4.8 Representing WAHT online when acting in an official capacity

Whilst the Trust encourages individual members of staff to use social media to reflect positively on the work of WAHT, it is important that the organisation maintains a coherent online presence through the strategic use of official communication channels. Therefore, staff should seek approval in advance from the communications team before setting up :

- Twitter accounts, Facebook pages, YouTube channels or a presence on any other social media site that seek to represent the official views of WAHT;

- unauthorised 'official' blogs on behalf of WAHT programmes or individuals; or,

posting video content or setting up surveys using any unapproved online channels.

4.9 Establishing an official presence on social media sites

Using social networking sites to communicate with stakeholders in a professional capacity is in many cases entirely appropriate. However, it is important that the time and effort staff spend on them is justified by the value to the business, and that the inherent risks are considered before this type of media is used. Social networking platforms can offer many opportunities to reach a specific audience but there are also potential pitfalls to avoid.

If a member of staff wishes to establish a WAHT presence on Twitter, Facebook, LinkedIn, Snapchat, WhatsApp, or any other social networking site discuss the proposal with the communications team in the first instance, to ensure that it is appropriate and in-line with the organisations social media strategy.

The team will provide advice on the types of things which need to be considered, such as: project management, time and resources needed to implement, editorial and approvals policy, evaluation process and timeframes, risks and issues, exit

strategy, how to link this activity to the overall business plan for a programme or business area, and stakeholder consultation and approvals.

Before establishing a presence on any social networking media, this must be discussed with Comms Consideration should be given to considering the benefits to the department.

Given the time and resource involved in effectively managing a presence in social networking media, there must be a clearly evidenced demand from an audience for engagement activity using a particular channel, rather than engagement using existing online networks.

Please note, requests for information made via Twitter or other online channels can be considered as freedom of information (FOI) requests where the real name of the requester is discernible. More information on the corporate use of social media and other digital channels is available on the WAHT Intranet.

4.10 Official WAHT blogs

Blogs are a great way to share engaging content, written using an informal and personal tone, which can help to establish WAHT as a thought leader, setting the agenda, and stimulating discussion. WAHT wishes to encourage a blogging culture for all employees. WAHT blogs are published on our website.

If a member of staff wishes to set up a blog to write in their capacity as an WAHT employee, the proposal is to be discussed with the communications team in the first instance. The team can provide advice on the types of things need to be considered, such as: content; timing; newsworthiness; time and resources to manage and maintain; editorial policy; whether this is the best medium for the proposed message and how it might fit into the bigger engagement picture

Opportunities occasionally arise for employees to blog, in an official capacity, on alternative platforms or websites. To ensure that they are appropriate, and provide benefit to the organisation, these opportunities must be discussed, and agreed, with the communications team.

4.11 Video and media file sharing

Video is an excellent medium for providing stimulating and engaging content, which can potentially be seen by many people as it is easily shared on social media sites and embedded on other people's websites.

To reach the widest audience, it is important that all public video content is placed on the WAHT YouTube channel from where it can be shared, embedded on WAHT owned websites and those owned by others.

In order to protect the confidentiality of patients and the reputation of staff, the communications team is to be consulted regarding plans or requests to film or photograph staff, patients, visitors or facilities.

Any individual should seek permission before filming or taking photographs on our hospital sites. If secret footage is recorded and subsequently used by a broadcaster, the communications team will take necessary action. For example, any footage or

photographs would be subject to broadcast regulations regarding justification, (meaning it would need to be in response to evidence of dangerous or criminal practice), not just bad practice. There would also have to be a public interest defence for any covert recordings that are broadcast. Furthermore, various legal remedies before broadcast would be possible if these conditions are not met. Post-broadcast, complaints would be made to broadcast watchdogs.

The communications team can assist in coordinating any filming and will liaise with those staff that may be affected.

In some circumstances when film crews (not members of the media) request permission to film our facilities (and not our staff, patients or visitors) the estates team will negotiate a fee and facilitate filming. This is only to be undertaken with the prior permission of the communications team.

Before approving and arranging any filming, the communications team will discuss any proposals in detail with clinical and managerial colleagues, taking account the impact on the clinical services. The team will also consider any clinical or ethical issues and coordinate necessary risk assessments before granting consent for filming or photography to take place.

Due regard will always be given to the wishes of staff and patient confidentiality will be robustly protected. Where filming or photography includes patients, their prior permission will always be sought in line with the General Data Protection Regulations 2018, and their wishes respected. In every case the media must be clear about how any footage or photography of patients will be used in the future and signed consent obtained on that basis.

The communications team will, in some circumstances, refuse permission for filming or photography on Trust property. Members of the media should not be on-site in a professional capacity without being escorted by a member of the communications team. Members of staff who see anyone taking pictures or filming within the Trust's boundaries, are to urgently contact the security team and the communication team.

If a member of staff is planning to share pictures or video taken on Trust premises via social media they are to ensure that all video and media (including presentations) are appropriate to share/publish and do not contain any confidential, commercially sensitive, copyright infringement or defamatory information. If the material is official and corporate WAHT content then it must be branded appropriately, and be labelled and tagged accordingly. It must not be credited to an individual or production company.

As an organisation the Trust has a moral and legal responsibility to ensure that accessibility guidelines are met and that it provides material that is usable by all, regardless of disability or access to the latest technology.

When publishing video content a transcript should be provided alongside the video content or closed captions should be added. For further guidance on appropriate multimedia file formats, legal and accessibility considerations, contact the communications team.

Collections of photos, for example, those taken at a conference or training event, can be placed on the corporate Flickr account/Trust website. Contact the communications

team for further details. The Comms team will ensure that all images are stored and shared in accordance with the General Data Protection Regulations 2018.

4.12 On-line surveys

If a member of staff wishes to run an externally facing online survey they need to contact the communications team in advance. It is important that the organisation takes a joined-up approach to contacting stakeholder groups, so survey activity may need to be considered in the context of other pieces of work.

4.13 Participation in collaborative communities of practice

If a member of staff wishes to participate in online collaboration using externally facing web based tools, with NHS colleagues or suppliers, on WAHT projects and documents, they are advised to carefully consider security. In the majority of cases, when involved in collaborative working, discussion and the sharing of work related information and documents must take place in a closed environment, behind a secure login, to minimise the risk of unapproved or commercially sensitive material reaching the public domain.

All information stored on internal or external websites must be held in accordance with the WAHT Information Governance Policies and the General Data Protection Regulations 2018.

If a member of staff has a requirement to set up a new collaboration, community or consultation space in a professional capacity, they must contact the communications team to discuss their needs in the first instance. They will be able to advice on the tools available which fit the requirements.

4.14 Non compliance

WAHT's policies apply to all forms of communication, whether it be verbal, in print or online. Staff should remember that they are ultimately responsible for what they publish online and that there can be consequences if policies are broken. If a member of staff is considering publishing something that makes them even slightly uncomfortable, they are asked to review this Policy and if they are in any doubt or in need of further guidance, they should contact the communications team to discuss.

Non-compliance with the policies associated with this guidance may lead to disciplinary action in accordance with the WAHT Disciplinary Policy. Staff are also reminded that actions online can be in breach of the Dignity at Work/Harassment/IT/Equality and Diversity policies and any online breaches of these policies may also be treated as conduct issues in accordance with the Disciplinary Procedure.

4.15 Further information and assistance

The communications team is available to give help and advice, and should be consulted in the early stages of the planning process. Guidance on the use of specific social media tools is available on the WAHT Intranet.

5. NAMING OF WARDS

In order to ensure that there is a uniform approach to the naming of buildings, wards and departments, as well as the opening of new and refurbished wards and departments, this Policy sets out the approach and principle to be adopted.

Any proposal to name a new ward or department should be submitted to the Trust Leadership Group for consideration. Proposals to change the name of an existing ward or department will only be considered in exceptional circumstances and due consideration must be given to the costs involved (such as replacing signage).

The Trust Leadership Group will consider all such requests based on the following criteria:

- the appropriateness of the proposed name (especially if it is to be named after an individual).
- whether the name will be clear to patients and visitors.
- the consultation process that has taken place to reach the proposed name and the level of support it has from staff, patients and other stakeholders, and historic factors.

In addition, in order to ensure that maximum awareness is given to the opening of new or refurbished units, it is essential that the Trust's communications team is involved at an early stage. This will help to ensure a consistent approach with regards to media coverage (where appropriate), opening events and implementation of strategies to raise awareness of the change to those who need to know.

In addition, finance, information services and purchasing and logistics also need to be aware of any change.

It is important to maximise the awareness of new and refurbished wards and departments and to raise the profile of such developments in a consistent way across the Trust. In order to facilitate this, the lead person responsible for making arrangements for the official opening must notify the communications department as early as possible, and not later than six weeks before the planned opening.

The communications department will advise on media coverage and who should be present for the opening. Please see the VIP Policy for details on handling VIP and celebrity visits.

6. IMPLEMENTATION

6.1 Plan for Dissemination

The Policy will be placed in the Trust's HR Document library on the Intranet and will be publicised through Trust briefing and/or Weekly Brief.

6.2 Training and awareness

Awareness of this Policy will be raised throughout the Trust. It will form an integral part of Equality and Diversity, Dignity at Work and Freedom to Speak Up training.

6.3 Monitoring

Performance against the Policy will be monitored by the HR Department through casework monitoring. Learning will be agreed with staff side and shared through the organisation by the Comms Team.

In working with the media, the communications team recognise just how important it is to monitor and share relevant coverage. As such, broadcast, print and online media is monitored daily, with briefings created and shared regularly with Trust's non-executive and executive directors, relevant managers, senior leaders and the staff involved.

Every media query, the outcome and related coverage is compiled daily, with all press releases and statements filed and recorded. This daily compilation then feeds into a Weekly Media Report – a comprehensive document that details the number of reactive queries dealt with, press releases issued and coverage received.

Any unofficial media coverage, or coverage which is incorrect or biased, will be followed up by the communications team.

6.4 Policy Review

This Policy will be reviewed in two years or earlier by the JNCC in the light of any legislative changes, developments in good employment practice, significant incidents reported, and to ensure its continuing relevance and effectiveness.

7. REFERENCES

Equality, Diversity & Inclusion Policy	WAHT-HR-445
Dignity at work Bullying and Harassment Policy and Procedure	WAHT-HR-016
Risk Management Strategy and Policy	WAHT-CG-007
Information Security Policy	WAHT-ICT-002
Standards of Business Conduct Guidelines – Declaration of Interests and Acceptance of Gifts and Hospitality	WAHT-HR-525
Information Governance Policy	WAHT-CG-579
Code of Conduct for Employees in Respect of Confidentiality	WAHT-IG-001
Internet and Email Access Policy	WAHT-ICT-001
Freedom to Speak Up Policy	xxx

8. CONSULTATION AND APPROVAL PROCESS

The Policy has been developed in consultation with Trade Unions (Staff Side) and management representatives through the Policy Working Group.

The Policy has been approved by the Joint Negotiating and Consultative Committee

Trust Policy

4ward

NHS
Worcestershire
Acute Hospitals
NHS Trust

Supporting Document 1 - Equality Impact Assessment Tool

To be completed by the key document author and attached to key document when submitted to the appropriate committee for consideration and approval.

		Yes/No	Comments
1.	**Does the Policy/guidance affect one group less or more favourably than another on the basis of:**		
	• Race	NO	
	• Ethnic origin	NO	
	• Nationality	NO	
	• Gender	NO	
	• Disability	NO	
	• Religion or belief	NO	
	• Sexual orientation including lesbian, gay and bisexual people	NO	
	• Age	NO	
	• Transgender	NO	
2.	**Is there any evidence that some groups are affected differently?**	NO	
3.	**If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?**	NO	
4.	**Is the impact of the Policy/guidance likely to be negative?**	NO	
5.	**If so can the impact be avoided?**		
6.	**What alternatives are there to achieving the Policy/guidance without the impact?**		
7.	**Can we reduce the impact by taking different action?**		

If you have identified a potential discriminatory impact of this key document, please refer it to Human Resources, together with any suggestions as to the action required to avoid/reduce this impact.

For advice in respect of answering the above questions, please contact Human Resources.

Supporting Document 2 – Financial Impact Assessment

To be completed by the key document author and attached to key document when submitted to the appropriate committee for consideration and approval.

	Title of document:	Yes/No
1.	Does the implementation of this document require any additional Capital resources	No
2.	Does the implementation of this document require additional revenue	No
3.	Does the implementation of this document require additional manpower	No
4.	Does the implementation of this document release any manpower costs through a change in practice	No
5.	Are there additional staff training costs associated with implementing this document which cannot be delivered through current training programmes or allocated training times for staff	Yes
	Other comments:	

If the response to any of the above is yes, please complete a business case and which is signed by your Finance Manager and Directorate Manager for consideration by the Accountable Director before progressing to the relevant committee for approval