



Croydon Clinical Commissioning Group

Croydon CCG

Communications and Engagement Strategy

Version 13

We will effectively influence, and through proactively engaging, involving and communicating, we will listen and act.

Contents

1.	Introduction	p.3
2.	Vision and priorities	p.4
	2.1 Vision	p.4
	2.2 Strategic objectives	
	2.3 Purpose	p.4
3.	Communications and Engagement Objectives	p.6
	3.1 Communication and engagement objectives	p.6
	3.2 Communication and engagement principles	p.6
4.	Our stakeholders	p.7
	4.1 Stakeholder mapping	p.7
	4.2 Approach	p.8
5.	Implementation	p.11
	5.1 A 3 year implementation	
	5.2 Evaluation	p.11
	5.3 Complaints management	p.12
	5.4 Crisis plan	p.12
6.	Risks and mitigation	p.13

Appendices

1.	Croydon CCG Strategy	p.14
2.	CSU Specification (C&E)	p.15
3.	Media policy	p.16

1. Introduction

Croydon Clinical Commissioning Group (CCG) is dedicated to commissioning the best possible services for the people of Croydon. A key component of our work is ensuring that we communicate and engage with our patients, the wider health and social care community, and our local stakeholders. This strategy has been developed to help us achieve this.

In March, the Health and Social Care Bill 2012 received Royal Assent and became an Act of Parliament. The Government's white paper 'Equity and excellence: liberating the NHS' published in July 2010 sets out a radical new vision for the health service in England where CCGs are being created to take on commissioning functions from Primary Care Trusts (PCTs) and manage the bulk of the NHS budget. This will include GPs and other clinical colleagues such as nurses and hospital consultants. A National Commissioning Board will hold CCGs to account and commission other primary care practitioners such as dentists, pharmacists and opticians.

It is vital that patients, local people and stakeholders understand who we are, what we do and get involved in our work. Our leadership role for the NHS in Croydon makes it our responsibility to maintain public trust and confidence both in the work of the CCG and other health services in the borough.

This strategy will underpin the delivery of our vision and our Integrated Strategy and Operating Plan. It lays out what we will achieve and how we will do this over the next 3 years. At this point we will review and update this strategy to make sure it continues to support and deliver our aims and priorities.

This strategy takes account of the communications and engagement duties that will become our legal responsibility as a CCG once we are authorised. These duties include:

- The legal duty to involve current and potential health service users or representatives in everything to do with planning, provision and delivery of NHS services.¹
- The legal duty to consult local authority overview and scrutiny committees on substantial developments or variations in the provision of services.²
- The statutory duty to produce an annual report on consultation and an annual report, including the annual accounts.

In addition whilst not legal requirements, the CCG will be judged on frameworks and guidance published e.g. NHS Patient Experience Framework.

¹ Section 242 of the NHS Act 2006

² Section 244 of the NHS Act 2006

2. Vision and priorities

Croydon faces major change in the coming years. Current health trends, changes in the make up of our local population, variations in the quality of health services provided, and our financial challenge mean that we need to transform the health landscape. This context sets basis of our vision and the delivery of that vision.

2.1 Our vision is

Longer, healthier lives for all

We will deliver this by working with the diverse community of Croydon, using our resources wisely, to transform and provide safe, sustainable, high quality, patient centred services

2.2 Our strategic objectives

An outline of our strategy to deliver this vision is set out in Appendix 1, with the detail available in the Integrated Strategy and Operating Plan. Our strategic objectives/priorities are:

- To achieve financial sustainability in three years
- To commission safe, high quality services in the right place and the right time
- To have collaborative relationships with other commissioners and with providers to ensure an integrated approach
- To develop as a mature membership organisation

2.3 The purpose of the communication and engagement strategy

Our communications and engagement strategy is critical to the successful delivery of our vision. The purpose of this strategy is to ensure that ***we will effectively influence, and through proactively engaging, involving and communicating, we will listen and act.*** This will ensure patients, public and stakeholders:

- **recognise the CCG as a credible local health leader** for commissioning and monitoring the delivery of health services
- **understand the CCG priorities** and the context in which they are set
- **are engaged in a meaningful way** in our planning
- **change their response and behaviours** to support the delivery of key strategic objectives such as improvement in people taking responsibility for their health and enabling them to self-management

To do this we must be open and honest in all our communications and we must actively seek ways to reach diverse communities and a range of stakeholders. We want to be seen as an open and listening organisation that has the needs of local people at its heart and delivers real benefits through collaborative and partnership working.

When communicating or engaging with any audience our key messages will be set in the context of:

- Aiming to achieve high quality, safe and effective services in the context of a significant financial challenge. We must use our resources wisely and to greatest effect.

- Tailor messages specifically related to our audiences and for the project we are working on

As a CCG we are starting to establish our reputation as a new organisation, the 360° stakeholder surveys being carried out as part of the authorisation submission will tell us how we are perceived and form the basis of future work to further establish our identity and ensure a positive reputation.

3. Objectives

This section covers the communication and engagement strategy objectives that we have developed and the principles we will use that underpin these.

3.1 Communication and engagement objectives

We have developed six objectives in order to meet the six domains of authorisation above. They are to:

- Build public and stakeholder confidence in our CCG and its leadership.
- Meaningfully engage with patients, carers and communities to ensure their systematic involvement in the commissioning of health services for local people.
- Encourage strong clinical engagement from constituent practices and wider local professional groups to ensure that clinical insights have a tangible impact and add value to the commissioning process.
- Make sure we have open and transparent governance and leadership in our CCG.
- Promote equality and provide evidence for Equality Delivery System for protected groups through our work and publication of equality objectives.
- Engage and empower the public and stakeholders in the priorities for Croydon and promote public confidence in services

3.2 Communication and engagement principles

We will use the following guiding principles in all our communication and engagement activities:

- Be open and transparent in everything we do
- Communicate in a clear, concise and inclusive manner
- Ensure meaningful and timely communication and engagement
- Work in partnership with all our local stakeholders
- Ensure good communication and engagement is part of our everyday work
- Promote a culture of equality across the CCG

4. Our stakeholders

4.1 Stakeholder mapping

Croydon CCG has started to build a wide range of stakeholder and partner relationships. Going forward as a new CCG, it will need to forge new relationships and strengthen others in its role as commissioner and health system leader.

Stakeholder mapping work has been undertaken to identify key stakeholders - those we need to work closest with - and to gain a clearer understanding of the tailored communications necessary to engage with them on an on-going basis.

Key stakeholders are outlined below. A full stakeholder map identifying key relationships and how the CCG plans to manage them is currently being developed.

Figure 1 Stakeholder map

Stakeholder Group	Includes
1. Corporate and Board partners	
NHS Related Partners	Our member practices Other Clinical Commissioning Groups Key providers including <ul style="list-style-type: none"> • Croydon University Hospital • Croydon Community Health Services (CUH) • South London and Maudsley NHS Trust (SLAM) • Virgin Care UK • London Ambulance services Croydon Borough Council Integrated Commissioning Team NHS Commissioning Board Croydon Local Professional Committees Regulators (NICE, Monitor, CQC)
Local Government Partners	Croydon Borough Council including Public Health Croydon Health and Wellbeing Board Croydon Health Overview and Scrutiny Committee
Local Economy Partners	Metropolitan Police Authority London Fire and Rescue Service Local universities and colleges Major employers and business partnerships
Staff	GPs Staff working in the member practices Integrated Commissioning Team

Stakeholder Group	Includes
	Commissioning Support Service staff
Other	Media including digital media
2. Neighbourhood partners	
Public Partners	LiNK Voluntary Sector and Community Groups
Political Partners	MPs, MEPs and Council members
3. Practice level partners	
Patient Partners	Patient Congress Patient Participation Groups / Patient Reference Group Patient Groups

4.2 Communication and engagement – our approaches and channels

Croydon CCG is committed to ensuring that its communication and engagement is tailored to meet the needs of its different audiences. Communication and engagement will be undertaken at the three levels identified in the stakeholder map above (Figure 1).

- Croydon wide (Board / Corporate level)
- Local area (Neighbourhood level)
- GP practice (Local level)

This strategy identifies 11 approaches to engaging partners across these three levels and the channels that will be deployed by the CCG to ensure maximum communication and engagement opportunities exist to engage with local patients, the public, community groups and stakeholders. A detailed C&E implementation plan is currently under development, being led by the CCG Board lead for Communication and Engagement.

At Board / Corporate Level there will be:

1. Effective Patient and Public Engagement

The CCG has developed a framework for Patient and Public Engagement to provide an infrastructure to ensure patient and community views are integral to the commissioning work of the CCG. The establishment of a **Patient and Public Reference Group** will play a key role in the success of the framework. The Panel will be developed to quality assure the levels of patient and public engagement activity undertaken by the CCG.

The panel will comprise of LiNK Patient Congress, Community and Voluntary Group representatives and will be chaired by the PPI lay representative on the CCG Board. The CCG will also seek to appoint a patient and public engagement champion from outside the NHS, a local person who can bring their wider experience to the group. Training and development will be provided to support Panel members to discharge their responsibilities.

Patient and public representatives will work alongside CCG staff to ensure patient and community views are integrated into the Commissioning Programme which will play a vital role in the delivery of QIPP.

2. Appropriate Communications and Engagement Capacity and Capability

The CCG, like any new organisation, needs the people with the right skills and experience and the infrastructure in place to deliver its requirements as set out in the national authorisation guidance. The appropriate level of resource will be deployed to deliver a full range of communications and engagement service. This will include reputation, stakeholder and relationship management, media and crisis management, corporate, brand and digital communications, staff and practice communications, social marketing and patient and public engagement. Many of these functions will be provided through the Commissioning Support Service (refer to specification in Appendix 2).

3. Develop a CCG brand / story / key messages

The launch of any new organisation means the development of a new identity; an identity that reflects the organisation's vision, values and aims. The Communications and Engagement team will work with the Board, practice leads and key stakeholders to design and test the CCG's new branding (logo and corporate style) and importantly to develop a core script, a narrative or story which explains in a nutshell what the CCG is all about and what it is going to achieve. They will also test the 'CCG story' with key stakeholders to ensure it is clear, appropriate and easily understandable depending on the audience.

4. CCG Launch Event

One of the first priorities of the new Board will be to launch the CCG as the NHS commissioner in Croydon. A special event will be organised for the Spring of 2013 and this will be the spring board for on-going stakeholder, patient and public engagement, proactive print, broadcast and digital media relations and system-wide reputation management. Subsequent events promoting best practice and clinical, quality and technology innovation will be planned later in the year, giving the CCG an excellent platform to undertake further stakeholder, patient and public engagement.

6. Building Practice Engagement

Practice engagement is crucial to the long term success of the CCG. The Communications and Engagement team will work with the Board and practice leads to develop a Practice Engagement Plan by which communications between the CCG and practice staff is timely, two-way and credible. The stakeholder event convened on 11th September provided an opportunity for member practices and wider stakeholders to come together and share the CCG's vision, aims and commissioning priorities.

7. Aligning Patient Experience and Patient and Public Engagement

Understanding and listening to patient and community views is a key part of the CCG's commissioning role. The Communications and Engagement Team will work closely with the Quality and Performance Team to develop a single process by which the views of patients, carers, the community and stakeholders are captured so that the Board is well informed and can take appropriate action. These will include national patient surveys; Regulator reviews and reports, contract deliverables, PALs and complaints information, blogs, media stories, partner information and Patient Reference Group and LINK feedback.

8. Social marketing to drive Behaviour Change / Moving to a Digital Age

The CCG will capitalise on the opportunities social and digital media has to offer, coupled with the benefits of adopting a social marketing approach to better target its communications and engagement activities and deliver behaviour change. For example social marketing techniques will be applied to the Unplanned Care workstream to support demand management initiatives and reduce the number of local people who use Accident and Emergency for non-emergency problems and issues.

The CCG website will provide a platform for both promoting the work of the CCG and raising the profile of local services, including direct information for patients and carers on different conditions, pathways and self care techniques.

9. Annual Patient and Public Perception survey

The CCG will regularly monitor the perception of its stakeholders, including the views of patients and the public, in terms of its effectiveness as a commissioner and their perception of how they can influence the decisions made. The Communications and engagement team will work with the Board to identify how best to deliver an annual survey ideally working with local partners to undertake a joint survey. The CCG web site will be utilised as a platform for managing patient surveys.

10 Partnership and Stakeholder working

The Communications and Engagement Team will support the CCG in its new role as health commissioner in Croydon and will promote and facilitate the work of the CCG in developing with Croydon Borough Council, the Health and Wellbeing Board and associated strategies and plans. The CCG will work closely with LINK during its transition to Health Watch and other community and voluntary sector groups to ensure an integrated network for patient and public engagement develops.

At Neighbourhood level there will be:

10. Local practice networks

The development of network practice teams in six areas of Croydon, gives the CCG and local practice leads and excellent opportunity to work with local community based groups, individual patients and members of the public. The Communications and Engagement team will work with Board GP lead responsible for PPI to develop opportunities to develop mechanisms to engage with and involve local groups and individuals in commissioning decisions.

At Practice level there will be:

11. Practice Participation Groups

Croydon CCG via its local networks will be developing Practice Participation Groups (PPGs) which represent individual patient at specific GP surgeries. These groups are important to the CCG who would wish to promote their activities and work closely with them to ensure that the views of local patients can influence wider CCG commissioning decisions. The Communications and Engagement team aims to support local GPs, Practice Managers, PPGs and their members to get more actively involved in the work of the CCG and the commissioning decisions it makes on their behalf.

5. Implementation

5.1 A three year implementation plan

A comprehensive implementation plan is being developed setting out clear objectives against each level of stakeholder engagement. This is being lead by our Clinical Lead with Health Watch. The key approaches described in Section 4 constitute the foundations that the CCG wish to put in place across year 1. The 3 year implementation plan will be fully scoped by the new C&E team based in the Commissioning Support Service ensuring ownership and engagement across the staff and CCG.

As part of our Organisational Development plan, we have scoped our communication needs and the capacity required to deliver them. The CCG have selected a model of delivery along lean principles, choosing to buy an end to end solution from the SWL Commissioning Support Unit. A specification from the CSU setting out a C&E offer has been approved by the CCG (Appendix 2). Many of the functions described in Section 4 will be incorporated into this offer.

The range of services to be covered by the agreement with CSU will include expert strategic and operational advice and support to the Board to deliver this communications and engagement strategy.

They will be responsible for:

- Handling all press enquiries
- Organising proactive PR campaigns
- Supporting the development and maintenance of the website and intranet
- Co-ordinating all responses to briefing requests
- Monitoring FOI responses deemed to be politically sensitive or contentious
- Writing and producing newsletters and updates
- Exploring and developing new communication and engagement mechanisms
- Advising on engagement and consultation methods and mechanisms
- Advising on stakeholder management
- Managing communications in a crisis or major incident

This list is not intended to be exhaustive but lays out the key responsibilities of the communications team supporting the CCG.

5.2 Approaches to evaluation

The following best practice techniques will be utilised to evaluate the success of the C&E strategy and its 3 year implementation plan.

Board, neighbourhood and practice leads workshop to co-design vision, values, aims and strategic priorities	GP practice patient surveys
Online public and patient surveys focusing on specific issues – do you understand the Strategic Commissioning Plan, vision, values, aims/ can you influence the CCG?	Temperature checks from Regular feedback from the Patient and Public Advisory Forum, the Patient’s Congress feedback

Print and broadcast media coverage / reach	Annual Patient and Public Perception Survey
Online diagnostics track face book, twitter and web traffic	Neighbourhood based Focus Groups
Stakeholder feedback and survey	Event success – attendance, feedback questionnaire

5.3 Complaints management

Croydon CCG's current complaints procedures are managed within the PALS service. As we work towards authorisation, the following arrangements are in place for handling concerns and complaints raised with the CCG:

As part of the agreement with the CSSU, it is intended that they provide ongoing management of complaints/PALs, including:

- Access to joint South London Quality Improvement Workshops: result of SI and Complaint trends and patterns , complaint reporting
- Liaison with communication team to produce PALS and complaints information for patients
- Triangulation of PALS/complaints data with other quality information – reflected in CCG reporting

We will ensure that the appropriate actions are taken and outcomes clearly communicated.

5.4 Crisis Plan

The CSU specification incorporates an agreement that the CSU will provide 24/7 media management, including crisis management.

In the event of a crisis, the Board will also work closely with the CSU communications team to ensure that member practices, staff and other primary care contractors are informed of relevant and useful information. In essence we will:

- Use existing communication channels to inform our stakeholders.
- Liaise with our communication colleagues in our partner organisations including Croydon Borough Council, local acute providers (Croydon Health Services NHS Trust), local mental health providers (South London and Maudsley NHS Foundation Trust), the NHS Commissioning Board and the local police to promote a consistent set of core messages for professionals and the public.
- Work with the media to communicate messages to the public. Our media policy outlines our approach to working with the media.

- Be responsible for briefing the NHS Commissioning Board on any key issues they need to be aware of.

6 Risks and mitigation

Communications risks and mitigations are listed below. They will be reviewed and updated quarterly by the Board. The table below sets out the key risks to delivery of this strategy going forward and mitigating actions to reduce risk:

Risk	Mitigation
Vision of stakeholder engagement is not owned by all of Croydon CCG Board members and member practices	The planning and delivery of engagement and consultation will involve all Board members and representation from the majority of member practices.
Stakeholder engagement is seen as optional rather than core business	<p>We have adopted this strategy to mainstream stakeholder engagement and consultation.</p> <p>We will champion the strategy and make sure all members do the work outlined in the initiatives of this strategy.</p> <p>The planning and delivery of engagement and consultation involves representation from a range of member practices.</p>
Lack of focus in engaging and consulting.	<p>We will assess what types of engagement and consultation activities we want to conduct, and what types of activities are best delivered by external partners.</p> <p>Social marketing techniques should be employed to help gain clarity about key target groups and more relevant forms of engagement with them.</p>
Over reliance on formal consultation.	<p>We will reinforce expectations that stakeholder engagement is part of all activity relating to local health and health services.</p> <p>Awareness-raising activities should be undertaken to explain the different levels of engagement, the different types of methods involved, and the different purposes they serve, supported by the Communications Team.</p>
Limited media coverage of positive stories	<p>Increase proactive media work with national and regional journalists and invite them to discuss key initiatives and upcoming strategies.</p> <p>Find innovative ways of promoting internal successes.</p>
Engagement and consultation 'fatigue'.	<p>We will ensure that processes are transparent, and that outcomes are communicated clearly and within reasonable timescales</p> <p>We will foster more sustainable relationships with a range of key target groups, so as to build up strong relationships and good understanding through time.</p> <p>Engagement and consultation should be targeted, and clearly explained.</p>
Insufficient long-term investment in engagement and consultation.	<p>We will ensure that investment is appropriately targeted.</p> <p>We will make strategic decisions around investment, with the benefits of engagement and consultation clearly spelt out.</p>
Stakeholders in Croydon not understanding the imperative for change.	We will ensure that the rationale behind our decisions is clearly articulated - including both the drivers for the change and the reasons for the particular proposed solution.

Appendix 1: Croydon CCG Strategy (DRAFT)

This sets out the CCGs vision and priorities. The detail of which can be found in the Integrated Strategy and Operating Plan.



Appendix 2 CSU Specification

To Be Added Once Finalised

Appendix 3 Media policy

1. Introduction

Croydon CCG has a duty to be accountable and open about its decisions, policies and actions and ensure that the highest possible standards are maintained. Communication with the media is an integral part of this openness and accountability. The media: newspapers, television, radio, web-based news sites and other news organisations, can be very helpful for the NHS because they can reach more staff and patients more quickly than any form of communication we organise ourselves.

Positive media coverage helps the NHS attract staff and maintain the confidence of patients. Negative media coverage can damage staff morale and, despite the high quality of local NHS services and decision making process, can worry and upset our patients.

At the same time, effective media relations also require honesty, mutual trust and understanding.

1.1 Purpose / Rationale

This procedure is designed to help to ensure that:

- Board members, GP members and their staff, and support staff are not compromised in any way by media interest or pressure.
- Any information that we issue to the media is honest, appropriate, informed, accurate, consistent and timely.
- Interviews given, or statements issued, accurately reflect our policies, practices and services and do not compromise or threaten its reputation.

1.2 Aims and Objectives

The procedure provides guidance on:

- Routing media enquiries through the organisation.
- Who needs to be informed regarding enquiries from, and responses to, the media.
- The situations where staff are authorised to speak to the media on behalf of Croydon CCG
- The role of the communications team.

1.3 Scope

This document is for all Croydon CCG member practices, including all practice staff as well as GPs themselves. It also covers all staff in the support organisation.

The NHS South West London communications team will advise and support us on proactive and reactive media handling.

2. Definitions

Principles

In its dealings with the media, Croydon CCG will comply with the Caldicott guidelines ensuring that:

- The duty of care and protection of a patient's right to privacy, dignity and confidentiality is paramount.
- Contact with the media never detracts from the primary purpose of care delivery.
- Media activity does not detrimentally affect the duty of care.

- Pressure is never put on patients, service users, carers or staff to participate in media activity.
- No inducement, financial or otherwise to take part in media activity will be accepted.

In addition, Croydon CCG will:

- Be open and honest in its dealings with the media.
- Respond to enquiries within deadlines wherever possible.
- When providing spokespeople, ensure that they have appropriate knowledge and expertise.
- Explain its policies, decisions and activities fully and clearly.
- Respond to criticism.
- Acknowledge mistakes promptly, confirm lessons learned and actions taken.
- Recognise the commitment of health and social care staff.

Definitions

- Media covers local and national newspapers, television and radio as well as web-based media and press agencies.
- Pro-active media activity refers to all contact with the media that is initiated by Croydon CCG.
- Re-active media activity refers to all contact with the media that is unsolicited by Croydon CCG.

3. Duties

All staff have a responsibility to ensure that they comply with the procedure. All Board members have a responsibility to ensure all GP members and their staff are aware of the procedure and understand its implications.

4. Content

Why Croydon CCG needs a media procedure

The media: newspapers, television, radio, web-based news sites and other news organisations, can be very helpful for the NHS because they can reach more members of the public, patients and staff more quickly than any form of communication NHS South West London can organise.

Positive media (can also be described as proactive) coverage helps the NHS attract staff and maintain the confidence of patients. Negative media (often the result of a response to a reactive media enquiry) coverage can damage staff morale and, despite the high quality of our services, can worry and upset our patients.

Croydon CCG is an open organisation. We have a duty of accountability to the public, the media and other organisations. If we are asked questions, unless there are very important reasons, such as patient confidentiality, we should answer them.

This media procedure aims to make sure that we:

- are proactive in managing our reputation.
- are consistent, open and honest in our approach to our relationship with the media.
- Have a good overview of how we are perceived as an organisation.

How the communications team work

Croydon CCG is supported by NHS South West London's communications team who are experienced staff. They provide communications advice and support throughout the

organisation. We work with other NHS organisations, other local Clinical Commissioning Groups and the Department of Health, to promote the interests of all the local NHS services.

We have a press office, which operates during the working week, based on the 5th Floor at 120 The Broadway, in Wimbledon. We also provide an out-of-hours press service (24/7). When dealing with out-of-hours media enquiries, we liaise directly with the on-call managers and directors.

We have a duty to:

- Make sure good news stories are given maximum publicity, and potentially damaging issues are handled with sensitivity and care.
- Offer advice and support to staff on how issues relating to potentially good or bad news should be handled.
- Be aware of developments in the media, and throughout the NHS, so we can bring background knowledge to issues relating to Croydon.
- Develop strong working relationships with local journalists, acute trusts, mental health trusts and the Department of Health.
- Work closely with the NHS Commissioning Board on issues, which might be of national interest.

Media enquires

All media enquiries of any kind, in relation to Croydon CCG members and their staff, and their support teams will be handled by the NHS South West London communications team.

You can contact us:

- During normal working hours, call 020 3458 5717.
- Urgent enquiries, outside of normal office hours call the out of hours press office number 07584610055.
- Email media@swlondon.nhs.uk.

What to do if the media contacts you

No member of staff should enter into discussions with journalists on behalf of Croydon CCG 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.

(Please also see sections below “Professional Medical Publications/Speaking to the media in a professional/personal capacity”.)

If you are contacted by anyone from a newspaper, television company, radio station, web-based news site or other news organisation, don't get drawn into conversation. It is essential that you redirect the journalist to the communications team without delay. This is usual practice and the journalist should not be surprised if you ask them to speak to the communications team as a first point of contact. Never give any information to a caller if you are not sure who they are.

The communications team will be the main point of contact with journalists. They will agree with the journalist what information they require from Croydon CCG 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 to provide information they should respond to the communications team and should 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 who will agree with the relevant director(s) who would be the most appropriate person to be interviewed.

Patient confidentiality

As NHS staff, we all have a particular duty to protect patient confidentiality and privacy. This requirement is paramount and you may not disclose any information about a patient, including their presence in a hospital or clinic, without their informed consent or the informed consent of their next of kin. Remember: even confirmation of health information in response to an apparently informed enquiry, for example, from a journalist, may constitute a breach of confidence.

Legal issues, serious incidents and complaints

Wherever possible, Croydon CCG will co-operate with media requests. However, there are circumstances, such as for legal reasons, where this might be inappropriate. The communications team is here to advise you on communications issues in respect of these situations.

You must tell us at the earliest possible opportunity about any issue, positive or negative, which would be of potential interest to the media, whether or not the media are aware of it. This might include (but is not limited to):

- Serious incidents of any nature
- Complex complaints and legal cases
- Enquiries from MPs or local councillors
- Staffing issues, which might reach the public domain through a tribunal or union action

The communications team will work with members of staff to prepare information and help manage the issue.

Filming and photography

You should discuss with the communications team about any plans or media requests to film or take photographs within Croydon CCG premises.

Please be aware:

- It can take several weeks to set up a film or photographic session, so you need to allow plenty of time to make arrangements.
- Filming on NHS premises usually requires a film location agreement to be signed by us and the film crew.
- The communications team can refuse permission for filming on site.
- If the media want to film, photograph or speak to patients about an issue, the communications team will take advice from the clinical staff as to whether or not this is appropriate.
- Due regard must always be given to patient confidentiality, we must always seek permission from patients for any filming or photographs and their wishes must be respected.
- Patients must be properly informed about how any film or photograph of them will be used in the future in order for them to decide whether they wish to participate. If they decide they want to participate, they must sign a 'consent form' before filming can take place.

The communications team may need to discuss proposals for filming and photography with clinical and managerial colleagues regarding:

- How it might enhance, or detract from, the CCG's reputation.
- Any clinical or ethical issues.
- Whether the filming will be obstructive to clinical care, breach patient confidentiality, or otherwise affect the work of our staff.

Professional medical publications

If the professional medical press with regard to your professional clinical practice, such as, but not restricted to, HSJ, BMJ, Pulse, Hospital Doctor, the Nursing Times or Primary Care Report contact you, please speak to the communications team before you provide them with any information or give them an interview.

Speaking to the media in a professional/personal capacity

Croydon CCG encourages debate about the NHS and other health issues. As individuals, our staff and members have every right to make their personal feelings public if they wish. We do not discourage staff from acting as spokespeople for any professional association or trade union they belong to. Equally, if you choose to comment either in this capacity, or as an individual, you must recognise that your comments may have a bearing on the work of Croydon CCG. Journalists sometimes seek conflict between public sector bodies and staff should be aware that it can be counter-productive to criticise other NHS organisations to the media. If you do make a comment about another organisation during an interview, please advise the communications team as soon as you have spoken with the journalist.

Please be aware:

- If you speak to the media on your own behalf, or as a representative of your profession, or as member of an association, trade union etc, you must ensure that your views, or the views of the body you represent, do not come across as the views of Croydon CCG.
- If you comment in a private capacity, you should not be interviewed on any CCG premises.
- if you comment in writing as an individual, such as in a letter to the press, in a way that is relevant to the organisation, you should use your home address.

In all cases, please let the communications team know in advance, so we can prepare for any further publicity or media calls that may arise from your comments.

How to contact the communications team

Always contact us by phone in the first instance. If necessary, leave a message on the answerphone and we will get back to you as soon as we can.

Enquiries by phone:

- During normal working hours, call 020 3458 5717
- If you receive an urgent enquiry, outside of normal office hours you can speak to the call the out of hours press officer. Please call 020 3458 5717 and listen to the answerphone message for instructions.

Only send enquiries or material by email, after you have spoken to us by phone. Email media@swlondon.nhs.uk

Only forward material to us by post, after you have spoken to us by phone.

Communications team

120 The Broadway
Wimbledon
London SW19 1RH

5. Dissemination and Implementation

5.1 Dissemination

The procedure will be disseminated via normal communications channels for internal communications. It will also be available via the intranet/extranet.

6. Monitoring & Compliance

All staff have responsibility to ensure that they are aware of policy/procedure documents which are relevant to their area of work, and that they act in accordance with these at all times.

Managers must ensure that departmental systems are in place to enable all staff to access relevant documents and to remain up to date on new and revised documents.