

15 March 2022

Stephen Ward
Waikato Times & Stuff

Via email: stephen.ward@stuff.co.nz

Tēnā koe Stephen

Official Information Act Request – OIA 14142 Board Policy Regarding Media Access to DHB Premises

On 15 February 2022, under section 12 of the Official Information Act, you requested the following information from Whanganui District Health Board (WDHB):

1. What was your board's policy regarding media access to your DHB premises to interview staff and patients, and take photographs and video before any COVID-19 restrictions were introduced?
2. Were any new conditions for media access introduced as a result of COVID-19?
3. If so, how was this decision made and why?
4. What were the new conditions and how did they affect access at different alert levels and under the current traffic light system?
5. What is your board's intentions for the future regards media access under COVID-19?
6. Do you feel your media access rules are consistent with the media's responsibilities to report accurately and promptly on issues, and also with the right of patients and staff to interact freely with the media if they consent?

Whanganui District Health Boards response:

- 1. What was your board's policy regarding media access to your DHB premises to interview staff and patients, and take photographs and video before any COVID-19 restrictions were introduced?**

The Whanganui District Health Board has a Communications Policy & Procedure which are endorsed by the Board, authorised by the Chief Executive and maintained by the Communications Manager.

- 2. Were any new conditions for media access introduced as a result of COVID-19?**

There have been no new conditions introduced as a result of COVID-19.

- 3. If so, how was this decision made and why?**

Not applicable.

- 4. What were the new conditions and how did they affect access at different alert levels and under the current traffic light system?**

Not applicable.

- 5. What is your board's intentions for the future regards media access under COVID-19?**

To continue under the existing policy and procedure, and update if and when necessary.

Chief Executive | Phone 06 348 3140



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6. Do you feel your media access rules are consistent with the media's responsibilities to report accurately and promptly on issues, and also with the right of patients and staff to interact freely with the media if they consent?

The policy and procedure ensure accurate information is made available to media and the public.

Please see attached documents:

WDHB-2002 Communications Policy
WDHB-2015 Communications Procedure

Under section 28(3) of the Act you have the right to ask the Ombudsman to review any decisions made under this request. The Ombudsman may be contacted by email at: info@ombudsman.parliament.nz or by calling 0800 802 602.

Should you have any further queries about the above information, please contact our OIA co-ordinator Anne Phoenix at anne.phoenix@wdhb.org.nz

Ngā mihi



Andrew McKinnon
Kaihautū Hauora – Acting Chief Executive
Whanganui District Health Board



Policy

Communications Policy	
Applicable to: Whanganui District Health Board	Authorised by: Chief Executive
	Contact person: Communications Manager, Communications

1. Purpose

The purpose of this policy is to state the Whanganui District Health Board's (WDHB) approach to communications – oral and written, internal and external.

2. Policy statement

Whanganui WDHB is committed to being open, honest and inclusive when communicating with internal and external audiences and to sharing information in a timely, consistent, appropriate, accurate and professional manner.

WDHB communications initiatives aim to reflect the positive aspects of the work done by health staff in the region, and to enhance the reputation of the health board. Those initiatives will deliver important health messages to target audiences.

WDHB is also committed to ensuring its communications reflect its values and further its goals of empowering a healthy and thriving community.

3. Scope

The Communications Policy applies to all board and committee members, all Whanganui District Health Board (WDHB) employees (permanent, temporary and casual), visiting medical officers, contractors, consultants and volunteers.

4. Prerequisites

In the application of this policy, the WDHB recognises:

- WDHB Privacy Policy
- WDHB Privacy Awareness Guidelines
- WDHB Patient Condition Guidelines for Media
- WDHB Code of Conduct
- NZ legislation that guides communication
- The Ministry of Health's A Framework for Health Literacy
- NZ Health Literacy Guidelines – three steps to health literacy
- Te Reo Maori – te Whanganui mita
- WDHB Pro-Equity policy

5. Definitions

Communications - the imparting or exchanging of information by speaking, writing or using other medium such social media and videos.

6. Roles and responsibilities

Roles	Responsibilities
Board members	Endorse the policy Adhere to the policy
Chief executive	Adhere to the policy Approve delegations within the policy as required
WDHB kaumatua and kuia	Provide advice for te reo Māori translation to enable implementation of the policy
Executive management team	Adhere to the policy Enable implementation of the policy
Board, committees and staff with delegated authority	Adhere to the policy Enable implementation of the policy
Operational management team	Adhere to the policy Ensure all staff are informed and apply the policy effectively
Communications manager	Leads operation of the policy Monitors use of the policy
Communications team	Enable operation of the policy
Staff	Understand their responsibilities and adhere to the policy and associated procedures.

7. Measurement criteria

- Media monitoring through Isentia
- Social media and website analytics (e.g. number of visits)
- Board reporting
- Feedback from patients and their whanau, communities, WDHB board and committees, Hauora A Iwi, community providers and Ministry of Health
- Evaluation

8. Related Whanganui District Health Board documents

- WDHB Writing Style Guide and Writing Style Companion Guide
- Delegations Policy
- Information Communications and Technology Security Policy
- Code of Conduct Policy
- Memorandum of Understanding between WDHB and Hauora A Iwi

9. Key words

Communication, media, publications, social media, submissions

Procedure

Communications Procedure	
Applicable to: Whanganui District Health Board	Authorised by: Chief executive
	Contact person: Communications Manager, Communications

1. Purpose

This procedure outlines the processes to be followed in the implementation of the WDHB's Communications Policy.

2. Scope

It applies to all board and committee members, all Whanganui District Health Board (WDHB) employees (permanent, temporary and casual), visiting medical officers, contractors, consultants and volunteers.

3. Prerequisites

- Communications Policy WDHB-2002
- Privacy Strategy WDHB-9988

4. Definitions

Communications - the imparting or exchanging of information by speaking, writing or using other medium such as social media (Facebook and Twitter) and videos.

Delegated managers – senior managers authorised by the CE and ELT to speak to the media. This also includes the Director of Area Mental Health Services (DAMHS)/Area Director - Substance Addiction (Compulsory Assessment and Treatment) Act 2017.

5. Roles and responsibilities

Roles	Responsibilities
Board members	Endorse the policy Adhere to the policy
Chief executive	Adhere to the policy Approve delegations within the policy as required
WDHB kaumatua and kuia	Provide advice regarding te reo Māori to enable implementation of the policy

Executive Leadership Team	Adhere to the policy Enable implementation of the policy
Board, committees and staff with delegated authority	Adhere to the policy Enable implementation of the policy
Operational management team	Adhere to the policy Ensure all staff are informed and apply the policy effectively
Communications manager	Leads operation of the policy Monitors use of the policy
Communications team	Enable operation of the policy
Te Hau Ranga Ora	Provide advice to enable effective and accurate use of te reo Māori and Whanganui mita
Staff	Understand their responsibilities and adhere to the policy and associated procedures.

6. Equipment and resources

The Communications Procedure applies to all equipment and resources used by the Communications Department and anyone else within, and external to, the organisation covered by the procedure.

7. Procedure

An official set of actions put in place to support the Whanganui DHB's ability to meet its obligations as set out in the Whanganui DHB's Communications Policy. Please refer No 13 Procedures in detail.

8. Measurement criteria

Media monitoring (Isentia), website and social media analytics, project evaluation, feedback from Ministry of Health, Minister's office, Board, DHB staff and stakeholders.

9. References

MidCentral DHB's Communications Policy
Māori Translation Policy

10. Related Whanganui District Health Board documents

Publications

- WDH B Writing Style Guide and Writing Style Companion Guide
- Communications Policy
- Information Communications and Technology Security Policy
- Publications Management Procedure
- Hauora A Iwi and WDH B Memorandum of Understanding

11. Appendices

Communications Policy

12. Key words

Communication, Communications, Communications Policy, Communications Procedure, media, permission, publications, sign-offs, social media, submissions.

13. Procedures in detail

13.1 General

All communication with external parties will be performed within the employee's scope of practice and delegated authority and shall represent the organisation's views in an accurate and professional manner. The employee will be mindful of the organisation's image as a planner, funder and provider of health and disability services. The onus is on the employee to establish the credentials of the enquirer.

All communication will be undertaken with the target audience in mind. The language used will be readily understandable, and respectful.

Where appropriate and relevant, messages and statements issued by the WDHB will acknowledge and reflect the cooperative and collaborative nature of relationships between Whanganui DHB and Whanganui's other health and social sector providers.

All written communication, whether electronic, handwritten or graphic will be in accordance with the WDHB's Writing Style Guide and Writing Style Companion Guide, using approved templates where applicable.

All communication sent by email must adhere to the WDHB's Information Communication & Technology Policy.

13.2 Media and public comment

Media enquiries are to be coordinated through the Communications Department and dealt with in a timely, helpful manner, while maintaining patient, client, resident, and employee confidentiality.

All media statements whether written or verbal are to be coordinated by the Communications Department and approved by the chief executive (CE), manager or clinical leader in accordance with WDHB's Delegations Policy. An embargoed copy of all media releases is to be circulated to WDHB Board members and the Executive Leadership Team prior to release.

At the time of release, the communications manager or communications adviser will send a copy to the following:

- Ministry of Health
- Local media
- WDHB staff requesting press releases
- National media when applicable
- Health and nursing magazines.

Employees may not make unauthorised statements to the media on matters relating to their work with WDHB. Employees may discuss with the media matters affecting their professional activities which do not impinge (by implication or otherwise) on WDHB policy or operational activities. In such cases, employees are to advise the Communications Department or an Executive Leadership Team member of their involvement.

However, this Communications Policy and Communications Procedure, does not take away the right for health professionals to invoke the protections of the Protected Disclosures Act 2000 commonly referred to as the Whistleblower protection in bringing to light any unsafe practise.

The board's chair is the official spokesperson for matters of governance and policy.

Committee chairs may speak on behalf of their committees and on governance matters falling within the ambit of their committee's terms of reference.

Board and committee members have the right to express their views in the media and public arena, but must make it clear the views are their personal views, and they are not speaking for, or on behalf of, the board in respect of current or future policy or decisions.

As a courtesy, Board members will inform the Board chair when they plan to express their personal opinion on Board matters to the media.

For policy, and issues defined as critical by the board's chair or the CE, the media spokespersons shall be the board's chair and/or CE as mutually agreed.

For operational issues, an Executive Leadership Team member may respond to the media, in consultation with the Communications Department. For special projects or incidents a media spokesperson may be appointed by the general manager or CE.

Issues which may cause significant public concern must be referred to the CE and the Communications Department. Where the issue involves a threat to public health, any response is to be developed in consultation with the Medical Officer of Health or designate.

Staff shall not publicly comment on the work, policy, actions, or efficiency of external organisations without agreement from the organisation concerned and without having the appropriate delegated authority.

Media are welcome to attend WDHB public board and committee meetings. Since filming or photographing the meeting can be disruptive to the conduct of the meeting, media are expected to contact the Board or committee chair as early as possible prior to the meeting, (but no later than a working day) so that agreement can be reached as to how the need of both parties can be met.

13.3 Protecting confidentiality

Media or other external parties seeking comment relating to patients/clients/residents and/or their welfare, including access for interviews and photographs, are to be handled within the organisation's policy on patient confidentiality. This states that the only information that may be released without the patient/client/resident's prior consent is:

- Brief general information concerning the nature of injuries to a person involved in an accident, provided this is within 24 hours of their admission.
- General information concerning the condition of the patient on the day of enquiry, unless the patient/client or their family/representative has expressly requested no information be given.

Where the media or other external parties are seeking comments on individual staff members concerning personal information, disciplinary and/or industrial relations procedures, including access for interviews and photographs, the response must take into account the need to protect employee privacy. The only information that may be released without the individual employee's prior consent is general information pertaining to the issue in question only (without divulging individual or personal details).

Where the media or other external parties are seeking comments on contract holders concerning contract arrangements, the response must take into account the need to protect information where the making available of such information would unreasonably prejudice the commercial position of the contractor, or, disclose a trade secret.

Patients/clients who are resident at WDHB's facilities and wish to be interviewed by the media have that right. All such requests should be referred to the Communications Department and must be approved by the CE or appropriate general manager.

Media on WDHB property without permission should be asked to leave, and, if necessary escorted from the premises by security.

13.4 Patient condition guidelines for media

To protect patient confidentiality, WDHB Communications staff, duty nurse managers and other staff permitted to speak to the media can release the following information only, to describe a patient's condition:

1. A patient's gender.
2. A patient's age described as child, teenager, in their 20s, 30s, 40s, etc.
3. A person's condition described as critical, serious, serious but stable or stable.

13.5 External publications

External publications, including newsletters, brochures, multimedia material (eg DVD/CD) must be consistent with the Writing Style Guide, and include the WDHB logo. External publications are to be approved by the Communications Department prior to completion.

External communication for mass distribution is to be approved by the Chief Executive.

13.6 Public meetings

When representing the organisation at public meetings, employees must inform their line manager and seek approval prior to the event.

13.7 Submissions

Submissions on policy and/or legislative matters, shall be made on behalf of the organisation as a whole and must be approved and signed by the appropriate ELT member. A copy of the final submission will be filed as a PDF in **Shared Drive/EMT/Submissions/Month and Year/Name of the Submission**. A hard copy is to be supplied to - and filed by - the Board office.

Staff who wish to contribute to a submission on policy and/or legislative matters, in their role as a Whanganui DHB employee, shall forward their views to the relevant ELT member or the person leading the submission's development.

The submission lead's name is stated in the Submissions Register found in the external submissions folder in **Shared/third tier managers & PAs/external submissions folder**.

All other staff (below third tier managers) can check the submissions register on the WDHB intranet.

Staff are advised to read the Whanganui District Health Board's Submissions Policy before making a submission.

13.8 Official Information Act requests

Responses to Official Information Act requests (made in accordance with the terms of the Act and for other than clinical records) shall be made on behalf of the organisation and must be approved and signed by the CE or appropriate general manager, and filed with the OIA co-ordinator.

13.9 Political correspondence

All correspondence to Ministers of the Crown or Members of Parliament, on behalf of the district health board or on Whanganui District Health Board letterhead, must be approved by the CE or appropriate general manager prior to being issued, and a copy provided to the board chair.

13.10 Filming

Media requests for permission to film/take photographs on WDHB premises should be directed to the Communications Department. Consents and a specific filming agreement should be signed with the film company and patient/client or next of kin prior to filming.

13.11 Intranet and website

Management of the intranet and website is the responsibility of the Communications Department.

The Communications Department approves what information is placed on the intranet and website. The Information Technology Department provides technical support to maintain the sites, as required.

All staff are to have access to, and be trained in the use of, the intranet.

13.12 Social media

For the purposes of this policy, social media refers to web and mobile-based technologies used to allow communication to become interactive dialogue between organisations, communities and individuals. It includes, but is not limited to, webzines, weblogs, social blogs, microblogging, wikis, social networks, podcasts, photographs or pictures, video, rating and social bookmarking, eg Facebook, Twitter, Flickr, YouTube, etc.

Board members and everyone covered by the scope using social media in their personal capacity, are reminded to adhere to the WDHB's and their professional bodies' Code of Conduct, ethics and standards and to not make comments/postings on behalf of WDHB, or in their role as a DHB employee unless delegated as part of their role. The privacy of WDHB's patients, staff and clients must not be breached or the DHB be brought into disrepute. Staff should always be mindful of the impact of any statements they make on their own and/or WDHB's reputation.

If an employee does communicate about WDHB-related issues they should include a disclaimer which makes it clear they are commenting in a personal capacity, e.g. *'the opinions and positions expressed are my own and do not necessarily reflect those of the WDHB'*.

13.13 Publications

Refer to the Publications Management Procedure

Refer to the Submissions Policy

13.14 Authority to speak to the media and sign-offs

Authority to speak to the media

- Executive Leadership Team members are authorised to speak to the media.
- If granted authority to do so by their line manager and/or the CE, other senior staff members may speak to the media.

Sign-offs

- Any letters, memorandums or documents written by the chief executive officer (CE) must not be released without his/her sign-off and permission to do so.
- In the CE's absence, the acting CE will be responsible for sign-offs.

- All media releases and media responses must be signed off by the person interviewed, the appropriate ELT member where required and the chief executive officer.
- As a courtesy, all media releases and media responses are sent to the Board on an FYI basis.
- All community updates and official documents must not be released without the CE's sign-off.
- The Staff Newsletter must be signed off by the CE before publication and distribution.
- Posters produced and printed onsite for public and staff viewing within the DHB campus must be signed off by the appropriate line manager.
- Posters printed by offsite providers for public viewing must be signed off through the Approval Plus delegation system.
- Sign-offs can be obtained by email or where appropriate, verbally.

13.15 Translations

Refer to the Māori Translation Policy to ensure that Māori translated material is of a high quality and that translations are consistent across the organisation. To protect and promote te reo Māori in a manner consistent with Māori cultural aspirations and preferences.

13.16 Time limits for responses

Urgent – within two hours

Medium – by the end of the day

Non-urgent – within a week

14. Legislation guiding communication

Communication shall comply with all relevant legislation which includes, but is not limited to:

- Privacy Act 1993
- Health Information Privacy Code 1994
- Code of Health and Disability Services Consumers' Rights 1996
- Employment Relations Act 2000
- Official Information Act 1982
- Protected Disclosures Act 2000
- Defamation Act 1992
- Electoral Finance Act 2007
- NZ Public Health & Disability Act 2000
- Crown Entities Act 2004
- Public Finance Act 1989

15. Related WDHB documents

WDHB Delegations Policy

WDHB Code of Conduct

WDHB Style Guide

WDHB Patient Confidentiality Policy

WDHB Information Communication & Technology Security Policy

WDHB Submissions to External Agencies Policy