Shropshire Community Health

Policies, Procedures, Guidelines and Protocols

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C		This document replaces the existing Local Counter Fraud Communications Strategy and encompasses fraud and security communications.						
2	November 2019	To amend all references relating to NHS Protect to read NHS Counter Fraud Authority						
3	November 2019	To update the policy to reflect on the new working arrangements and responsibilities of the NHS Counter Fraud Authority						

	Amendments History							
No	Date	Amendment						
4	November 2019	To update on the current national Security Management overview arrangements						
5	November 2019	To update the policy with Lead Director's new title (Director of Finance and Strategy)						
6	November 2019	To include reference to the role of the Trust Associate Director of Finance in overseeing fraud, bribery and corruption, and security management related work						
7	November 2019	To update policy with new Director details with overall responsibility for Trust Communications (Chief Executive)						
8	November 2019	To update the policy with the Trust Communications lead officer title						
9	September 2021	To remove all references to previously published security standards.						
10	September 2021	To update Framework with Lead Director's new Title (Director of Finance)						
11	September 2021	Replace references to 'Anti-Crime Specialists' with 'Local Security Management Specialist'						
12	September 2021	Removal of references to 'fraud' following revised job role, changes to NHS Standard Contract and implementation of new Violence Prevention and Reduction Standards						
13	September 2021	Removal of references to 'standards for providers'						
14	September 2021	Updating section 4.2 to align with LSMS workplan						
15	September 2021	Updating 'anti-crime' references to 'pro security' for clarity						
16	September 2021	To update the policy with the Trust Communications Lead Officer title (Head of Communications)						
17	August 2022	Minor amendments to Appendices A and B to bring content up to date						
18	August 2022	To replace 'Director of Finance' with 'Head of Estates' in the body of the document						

Local Security Management Specialist's

Communication Framework

Local Security Management Specialist's – Communication Framework

1 Introduction

- 1.1 This document has been established to enable and evidence communication requirements to promote, and raise awareness of, security management initiatives including the publicising of proven NHS security related prosecution; including sanctions applied, and media handling.
- 1.2 The Shropshire Community Health NHS Trust (Trust) Local Security Management Specialist is committed to ensuring that effective communication is in place to deter and prevent the organisation from falling victim to security related criminal incidents, which divert much needed NHS resources from patient care. Through publicity, education, training, and the application of sanctions the organisation seeks to change attitudes to, and perceptions of, crime against the NHS. The message will be that crime is not victimless and that active cooperation is necessary in preventing valuable resources being diverted through criminal activity.
- 1.3 The Local Security Management Specialist will enlist the assistance of staff around the Trust who already have effective communication methods in place which may be utilised to publicise, educate and train staff throughout the organisation.
- 1.4 The types of communication utilised by the Local Security Management Specialist will be reported to both the Head of Estates and the Audit Committee along with details of evaluation and reviews taken place, which demonstrate how effective this work has been.
- 1.5 This framework concentrates on the following communication areas:
 - Media
 - Local promoting of crime awareness
 - Application and publication of sanctions
- 1.6 For any conflicts that arise in respect of this communication framework, the Trust Head of Estates and Trust Chief Executive will be consulted.
- 1.7 This communication framework is open to review and continual improvement particularly in light of further experience and new developments. Countering crime will require a comprehensive approach from everyone who works in and around the Trust.
- 1.8 The framework is summarised on a "Plan on a Page", which is included as Appendix A.

2 Background

- 2.1 Under the NHS Standard Contract, the Trust is required to have regard to the Violence Prevention and Reduction Standards. The Trust also has duties under health and safety legislation to provide safe and secure workplaces.
- 2.2 Effective countering of crime against the NHS requires due regard to be paid to any guidance and advice on media handling.
- 2.3 To create a pro-security culture requires effective communication in respect of the Local Security Management Specialist role and sanctions imposed for proven perpetrators of crime against the NHS.

3 Communicating with the Media

- 3.1 It should be noted that all communications with the media will be in line with guidance published in the Trust Media Policy and Procedure, which can be accessed via the following link: http://www.shropscommunityhealth.nhs.uk/content/doclib/11958.pdf
- 3.2 The Trust Head of Communications will receive an advance warning from the Local Security Management Specialist if there is a possibility of external interest in any potential criminal investigation, or awareness event. Appropriate measures may need to be put in place to protect the organisation from adverse publicity and ensuring continuity of patient services/care.
- 3.3 All press releases relating to security related incidents will initially be agreed with the Head of Communications in liaison with the Local Security Management Specialist. The opportunities of such press releases allow Trust staff, and members of the public to be aware about the security initiatives, the role of the Local Security Management Specialist, and the seriousness in which the Trust treats crime against the NHS.
- 3.4 The local Security Management Specialist will promptly brief the Head of Communications on any other contentious issue in relation to crime under their remit against the NHS, which is likely to attract interest from the media. Public interest/safety should always be the ultimate deciding consideration on whether to be proactive in these circumstances by releasing information or issuing a reactive statement.
- 3.5 Despite best efforts, information may be inappropriately leaked to the media about an on-going investigation. In such cases, the Head of Estates, and the Head of Communications should be contacted immediately so that a necessary course of action can be determined.

- 3.6 Any media enquiry received by the Local Security Management Specialist will be directed to the Head of Communications in the first instance. This will ensure a consistent approach across the Trust.
- 3.7 Any request to the Local Security Management Specialist for a media interview will be directed to the Head of Communications ensuring that the request is handled promptly and that the most appropriate person is interviewed. Requested media interviews about the Local Security Management Specialist role etc. will be notified to the Head of Communications.

4 Local Promoting of Local Security Management Specialist Awareness

- 4.1 To promote the role of the Local Security Management Specialist, various types of communication will be used to inform, educate and train staff, patients and visitors, and the wider local public about the effect crime against the NHS can have on patient care and how to report any knowledge or suspicions of potential criminal activity.
- 4.2 The type of communication undertaken by the Local Security Management Specialist is designed to cover the following key areas:
 - **Governance Arrangements** this involves regularly updating the Trust Audit Committee on the work of the Local Security Management Specialist by way of written and/or verbal updates throughout the year. The Local Security Management Specialist will also present their Annual Report of security management work each year to the Audit Committee.
 - **Creating a Pro-security Culture** this involves changing the attitudes and perceptions of security management within the organisation so that there is a willingness, and confidence, to report any knowledge or suspicion of criminal activity. The need to protect the Trust from such activity needs to be seen as a joint responsibility of everyone within the organisation. The creation of a pro security culture in which peer group pressure can make potential criminals feel that what they are contemplating is unacceptable, is an important element in reducing crime against the NHS.
 - **Prevention and Deterrence** The deterrent factor is about the extent to which potential offenders believe that if criminal activity is attempted it will be detected and prevented from succeeding. It also relies on communicating the message that full sanctions (including criminal action) will be considered, and appropriate action taken for all perpetrators of crime against the Trust. Raising awareness of the types of criminal activity that may occur and communicating this to Trust line managers, budget holders, Company Secretary, Audit Committee and

auditors of the organisation is important to ensure that systems being operated are not open to criminal activity occurring unchallenged or undetected.

- Investigation and Associated Actions The Local Security Management Specialist will need to communicate to all staff what action to take if a potential crime has been detected as inappropriate well-intentioned actions may compromise the pursuit of full sanctions if the offence can be evidenced. This type of communication needs to emphasise Trust support for staff who report such concerns so that confidence in the system can be maintained. The Local Security Management Specialist will publicise proven cases of criminal activity against the NHS that has occurred both locally and nationally. Communication in this area enhances the message that crime within the NHS will not be tolerated and that the Trust, and NHS, will pursue full sanctions whenever appropriate to do so. Wherever possible successful sanctions will be publicised to enhance the deterrent effect. Where a decision is taken not to publicise a sanction; for example due to extenuating clinical factors, the rationale behind this decision will be recorded.
- 4.3 In order to build confidence and encourage reporting of suspicions of crime against the NHS by Trust staff, the Local Security Management Specialist will ensure that staff, who report suspicions, receive feedback / acknowledgement of the action taken by the Local Security Management Specialist as a consequence of their referral.
- 4.4 The effectiveness of the communication methods explained in 4.2 and 4.3 may be assessed by use of a local staff survey periodically issued to a sample of staff across the organisation. The results of this survey will be reported to the Head of Estates and will inform future work undertaken by the Local Security Management Specialist to be included in their risk assessed work plan.
- 4.5 Appendix B details the communication methods and action plans to meet specific target audiences. Any other types of communication available around the organisation should be brought to the attention of the Local Security Management Specialist so that it can be added to the appendix.

5 Contact points

- 5.1 Any concerns about security management matters should be communicated to the Trust Local Security Management Specialist who can be contacted on telephone numbers 01743 277635, or 07818 421404 or e-mail address: terry.feltus@nhs.net
- 5.2 Further information can be located on the Trust Security Management webpage on the Trust intranet site, and the Trust Security Management Policy.

Plan on a Page – Appendix A

NHS

Shropshire Community Health

Local Security Management's Specialist's Communication Framework (2022 – 2025)

Objective: To enable and evidence communication requirements to promote, and raise awareness of, pro-security culture including the publicising of proven NHS security related incidents; including sanctions applied, and media handling.

Strategic Objectives

Caring For Our Communities

Looking After Our People

Managing Our Resources



Improving Lives in Our Communities

4 Key Principles

- **Governance Arrangements** embedding crime prevention and reduction measures across the Trust
- Creating a Pro-security Culture in those who work for or use the NHS about crime and how to tackle it
- Prevention and Deterrence of crime in the NHS to take away the opportunity for crime to occur and discourage those individuals who may be tempted to commit crime
- Investigation and Associated Actions investigating those who have committed crime against the NHS

Priorities: Programme of Work

- Produce a risk assessed programme of work
- Advise on and manage efforts to tackle crime against the Trust and raise awareness of security
- Provide support, direction and guidance in relation to security to all services operated by the Trust
- Implement relevant control measures to mitigate against identified risks relating to violence and aggression
- Provide security management awareness training to new and existing employees of the Trust
- Have regard for the Violence Prevention and Reduction Standards

Outcomes

- A safe and secure environment that protects patients, visitors and staff and their property
- A safe and secure environment that protects the physical assets of the Trust
- Adoption of current best practice
- Effective use of all available toolkits, frameworks, legislation and resources to deliver measures
- Robust internal controls and systems to mitigate crime against the Trust
- Effective performance delivery
- Reduction in assaults on staff

Development of an information and knowledge culture Collaborative partnerships for successful joint working

Supporting the provision of safe and effective care

Appendix B

TABLE OF COMPLETED KNOWN INTERNAL COMMUNICATION OPPORTUNITIES

Governance Arrangements							
Objective	Target Audience	Method	Timescale	Details/Action	Frequency	Responsibility	
Security Management Arrangements	Audit Committee	Annual report of security management work	Annually (July Audit Committee)	Written report presented to Audit Committee	One report per year	Local Security Management Specialist	
		Yearly update report of security management work	Annually (January Audit Committee)	Written report presented to Audit Committee	One report per year	Local Security Management Specialist	
		Other ad-hoc in-year progress reports (written and/or verbal) of security management work, as required	As required	Attendance at meetings as required	As required	Local Security Management Specialist	

Objective	Target Audience	Method	Timescale	Details/Action	Frequency	Responsibility
Creating a pro security Culture	Staff	Promote the role of the Local Security Management Specialist	Ongoing	Article in Trust newsletter (Inform)/Staff Noticeboard to promote Local Security Management Specialist role and disseminate security awareness information	At least two articles per year	Local Security Management Specialist, and Head of Communications
Creating a pro security Culture	Staff	Security Management webpage on Trust Intranet site giving awareness information	Ongoing	Local intranet webpage to provide staff with details on security management within the NHS and Trust	Update information when required	Local Security Management Specialist and Trust Webmaster
Creating a pro security Culture	Staff	Security Information / leaflets produced for all employees	Ongoing	Security information included on the 'Security Management' webpage	Update information when required	Local Security Management Specialist
Creating a pro security Culture	Staff	Security Awareness Training	Ongoing	Training provided to staff, as required, by way of 'Teams'/face to face presentations.	Ongoing	Local Security Management Specialist

Objective	Target Audience	Method	Timescale	Details/Action	Frequency	Responsibility
Creating a pro security Culture	Staff	Security Questionnaires:				
		a) Security 'Teams'/Face to Face Awareness Presentations	As and when	Questionnaire to gauge post presentation awareness amongst staff	Each Event	Local Security Management Specialist and staff
		b) Staff Survey	Periodic	Questionnaire to a sample of Trust staff to gauge the level of awareness amongst staff in order to influence future Local Security Management Specialist Work Plan and staff training requirements	Periodic	Local Security Management Specialist and staff
Creating a pro security Culture	Staff / Patients / Visitors	Dissemination of Security information	Ongoing	Security management Awareness Events / Information Stands / Road shows around the Trust geographical area	Regularly throughout the year	Local Security Management Specialist

Objective	Target Audience	Method	Timescale	Details/Action	Frequency	Responsibility
Prevention	Managers	Security Alerts and/or Intelligence Bulletins to a specific department(s)	As and when	E-mail/Datix alert information to relevant department(s), and inclusion on Security Management webpage	As required	Local Security Management Specialist
	Staff	Security Alerts and/or Intelligence Bulletins to all staff	As and when	E-mail/Datix communication to staff), and inclusion on Security Management webpage	As required	Local Security Management Specialist
Prevention	Staff	Identifying the risk of criminal activity in Trust Departments / Areas	Ongoing	Update Trust Director of Governance with details as appropriate	As required	Local Security Management Specialist
Creating a pro security Culture / Deterrence / Prevention	Staff / Patients / Visitors	Posters to give a positive image to staff and provide contact numbers, and online details, to report suspected criminal activity in the workplace	Ongoing	Security posters in Wards / Departments / public areas	Issued as required	Local Security Management Specialist and Department Managers

Objective	Target Audience	Method	Timescale	Details/Action	Frequency	Responsibility
Creating a pro security Culture / Deterrence / Detection	Staff	Specialist / Departmental Briefings	Ongoing	Customised presentations to raise awareness of crime	As required	Local Security Management Specialist and Trust Managers
Creating a pro security Culture / Deterrence / Prevention / Sanction / Redress	Staff / Members of the public	Publicise local and national cases	Ongoing	Publicise successfully applied sanctions through Trust Newsletter, and Staff Noticeboard	As required	Local Security Management Specialist, and Head of Communications
				Article in Local Press / Feature on local radio	As required	Local Security Management Specialist, and Head of Communications
				Include proven case information on Security Management webpage	As required	Local Security Management Specialist
				Include up to date proven security related cases in awareness presentations	As required	Local Security Management Specialist