

Group Media and Government Relations Policy

Purpose

The purpose of this policy is to ensure coordinated and effective media interaction, public communications, Government relations, advocacy and public policy activities on behalf of Southern Cross.

Scope

This policy applies to all employees of Southern Cross Medical Care Society (Society) and Southern Cross Health Trust (Trust) and their respective subsidiary companies (Southern Cross).

Policy Statement

Southern Cross wants to maintain a positive public image and constructive relationships with media, Government, and the community, and to protect its brand. Only authorised persons may represent Southern Cross or communicate on behalf of Southern Cross with media, Government, advocacy groups or in other public forums.

Policy detail

1. Designated spokespeople and unauthorised comment:

Group Communications & Brand oversees all public communications representing or on behalf of Southern Cross. Employees who are not authorised or designated spokespeople may not make any comment, provide information or conduct any activities representing or on behalf of Southern Cross:

- with media
- with Government
- in relation to advocacy groups or public policy activities, or in a public forum.
- While people may comment about Southern Cross on social media, they may not represent the organisation without authority.

If approached to do so, employees must refer to the Communications & Brand team. The [Media and Government Relations Guidelines](#) set out how to do this. For matters relating exclusively to their own businesses (e.g. operational matters) CEOs may deal directly with media or Government at their own discretion.

Those designated may only comment, provide information or conduct activities in relation to areas of the business that are within the parameters of their role or delegation.

2. Social media

- Only authorised material, comments and replies are to be posted or shared on any Southern Cross digital channels and only by authorised staff members.
- All Southern Cross staff are encouraged to like, share, forward etc that authorised material on their personal social media channels.
- Any person working for Southern Cross may post material relating to Southern Cross on their own social media profiles. However, employees have a responsibility to ensure their conduct on their own personal social media profiles does not reflect poorly on or bring Southern Cross into disrepute.

3. Filming/photography on Southern Cross premises

Filming, photography or video streaming on Southern Cross premises by commercial parties such as media and agencies, is only authorised with permission of Communications & Brand (or in the case of Southern Cross Hospitals, the relevant Hospital General Manager). A signed Filming/ Recording/ Photography

Agreement is required for any images taken that will be used externally. To protect our business and people's privacy - filming, photography or video streaming (including on mobile phones and tablet cameras) is also not permitted on Southern Cross premises by employees, members, patients, customers and visitors without permission where logos, the premises, work product and material, or other people can be identified.

4. Public Relations (PR) agency agreements

Southern Cross Chief Communications & Brand Officer has contractual agreements with, and retains the services of independent external PR and media experts on behalf of all Southern Cross businesses. Circumstances requiring additional services or use of a different external agency or agencies (relating to unpaid media) must first be discussed with the Chief Communications & Brand Officer. This includes but is not limited to PR agencies and media clipping or monitoring services.

5. Interaction with Government and Advocacy Groups

The Board will determine Southern Cross' overall public policy objectives, in consultation with the Chief Communications & Brand Officer and the CEO(s). The Southern Cross Chair, Chief Communications & Brand Officer and CEOs (or their delegates) are responsible for engagement with Government and advocacy groups, including formulation of public policy positions, related correspondence, written submissions, supporting research/statistical data and any other oral or written communications representing Southern Cross' views on regional, national, or international public policy or electoral activity.

6. Third Parties

Southern Cross will not permit Third Parties to represent Southern Cross in a public forum or to communicate on behalf of Southern Cross (including implying a relationship with or endorsement by Southern Cross) unless specifically authorised. Public forums or communications in this context may refer to material such as endorsements, case studies, promotions, advertising, in-house/industry advertorials and publications.

Definitions

- **Advocacy Groups**

In this policy, reference to advocacy groups includes professional lobbyists, industry lobby groups (e.g. HFANZ, NZPSHA and BusinessNZ), and community advocates (e.g. Grey Power, Age Concern, Commission for Financial Capability and Consumer NZ).

- **Employees**

For the purpose of this policy the term 'employees' includes temporary and fixed term staff, contractors, consultants, Directors and Trustees.

- **Government**

In this policy, reference to Government includes (but is not limited to) Government and Opposition Members of Parliament, all political parties and those working for them, Government departments and advisors (e.g. The Treasury and Ministry of Health), and applicable crown entities and agencies (e.g. ACC and PHARMAC).

- **Media/Public Forums**

In this policy, reference to the media or public forums includes (but is not limited to):

- Traditional media such as newspapers, magazines, television, radio, talkback
- Social and digital media such as online comments, chat rooms, bulletin boards, Facebook, Pinterest, YouTube, Twitter, Tumblr, Instagram, Wikipedia, LinkedIn, blogs, TradeMe forums etc.
- Non-Southern Cross newsletters, Third Party websites, endorsements, publications, petitions, submissions or public consultation processes.
- Any external speaking event.

Media also includes any future online or digital environments where content can be posted and/or created.

- **Third Parties**

In this policy, reference to Third Parties means any non-Southern Cross person or organisation and includes (but is not limited to) suppliers, clients, customers, partners, joint ventures, contractors, consultants, educators, agencies and organisations.

Consequences of Non-Compliance

Non-compliance with this policy could have the potential to reflect negatively on Southern Cross' business and image, cause reputational damage, legal liability and public embarrassment for Southern Cross. As a consequence, disciplinary and/or legal action may be taken for breach of this policy, up to and including termination of employment or contract.

Review

This policy is subject to periodic review to ensure it remains fit for purpose. If you have any feedback, please contact the Chief Communications & Brand Officer.

Approval and maintenance

This Policy is owned by the Boards of Society and Trust on behalf of their respective subsidiaries. The Chief Communications & Brand Officer or any Southern Cross CEO may make recommendations for the consideration of the Board(s). Any changes to this Policy must be approved by the Board(s) before becoming effective.