NHS
Kernow
Clinical Commissioning Group

Website management policy

Date approved: 30 January 2020

This policy was adopted by NHS Cornwall and Isles of Scilly Integrated Care Board (ICB) on 1 July 2022.

We are working to change the branding on our policies and to make sure they are accessible.

We intend to complete this work by 1 April 2023. While this work is underway, all references to NHS Kernow, the CCG and related structures should be taken to relate to the ICB.

This policy may not be suitable for users of assistive technology. If you use assistive technology (such as a screen reader) and need a version of this document in a more accessible format, please email ciosicb.corporategovernance@nhs.net. Please tell us what format you need. It will help us if you say what assistive technology you use.

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Document control sheet

Title of document:	Website management policy
Originating directorate:	Executive office
Originating team:	Communications and engagement
Document type:	Policy
Subject category:	Website management
Author(s) name:	Communications officer (digital and design)
Date ratified:	30 January 2020
Ratified by:	EMT
Review frequency:	Three years
To be reviewed by date:	30 January 2023
Target audience:	All staff
Can this policy be released under FOI?	Yes
	Give reasons for exemption if no:

Version control

Version No	Revision date	Revision by	Nature of revisions
3.0	10 October 2013	Head of Strategic Communications	Final version
3.1	28 November 2019	Comms officer (digital and design)	Policy updated
3.2	January 2020	EMT	Responsibilities section updated

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1. Introduction

The NHS Kernow Clinical Commissioning Group (NHS Kernow) website is a valuable communication tool for engaging with our staff, members of the public and key stakeholders. There must be a consistent standard applied to all areas of web publishing to ensure it reflects the values and reputation of the organisation.

The website aims to provide easy access to healthcare information, details about the organisation and key contacts.

2. Purpose

- To provide useful, efficient and accessible web services to staff and members of the public and other stakeholders.
- To ensure web content is up-to-date, accurate and relevant to the audience
- To ensure NHS Kernow's brand and reputation is maintained.
- To ensure web services support other corporate strategies.

3. Scope

This policy covers all content on our public website and applies to all members of staff.

4. Responsibilities

The communications and engagement team has responsibility for uploading and editing the majority of content on the website, however other individuals are responsible for maintaining the content in their areas (see below).

Content area	Responsibility for keeping information up to date
Localities	Localities team
Your health	Programme teams i.e. planned care, long term conditions, medicines optimisation
Get involved	Communications and engagement team
Choose well	Communications and engagement team
Continuing healthcare	Continuing healthcare team
Corporate governance	Corporate governance team
Equality and diversity	Corporate governance team
Governing Body meetings	Corporate governance team

Content area	Responsibility for keeping information up to date
Individual funding requests	Corporate governance team
Information governance	Corporate governance team
Primary care commissioning	Primary care contracting team
Patient care	Elective care team
Primary care networks	Localities team
Referral management service	Referral management team
Safeguarding	Nursing and quality team
Treatment policies	Elective care team
Annual report	Communications and engagement team
Anti-fraud and bribery statement	Finance team
Making a complaint	Corporate governance team
Media centre	Communications and engagement team
Our principles	Human Resources team
Our priorities	Finance and Performance team
Policies and procedures	Corporate governance team
Welcome from our chairman	Executive office team
What we spend and how we spend it	Finance team
Who we are and what we do	Corporate governance team
Working with us	Human resources team

It is the responsibility of each director to regularly review the content of NHS Kernow's website and ensure the pages assigned to their team(s) is accurate. This includes ensuring all linked documents are relevant and up to date. Staff can request updates to the website by contacting the communications team at kccg.contactus@nhs.net. Additional content must be approved by the relevant departmental head and/or the communications team before it is uploaded.

5. Web development

NHS Kernow's external web developer undertakes or oversees all technical web development work carried out.

Requests for web development work should be accompanied by functional specification and made to the communications officer (digital and design) who will assess the resource requirements, constraints and feasibility of each development request.

6. Accessibility

In accordance with NHS Kernow's commitment to fairness and eliminating discrimination, and to comply with relevant disability discrimination legislation, the website must follow principles of web accessibility.

The site aims to comply with priority one and priority two of the W3C Web Content Accessibility Guidelines (WCAG), as well as the Government's accessibility requirements.

Contributors should be aware of some common accessibility issues, including:

- Headings must be marked by using the heading styles provided in the stylesheet rather than by changing font size manually or using formatting such as bold or italic – use headings two and three.
- Images shouldn't be used to represent text (e.g. using images as buttons) because this can stop users from being able to change text size or colour in their utility preferences.
- Downloadable items such as PDFs should be made accessible where possible and include the file type and size in brackets next to the link.
- Format content such as lists using the styling functions within the content management system (CMS) - do not use asterisks to represent bullet points.
- Maintain a good colour contrast and certain colour combinations such as red on green must be avoided.

A full list of guidelines is available by clicking on the links above.

Content

All web content should comply with our style guide and corporate identity guidelines available on the staff intranet.

Content must be accurate - this is particularly important in the case of clinical content. Clinical content must be reviewed by a clinician before publication on any part of the website.

Content must be as up-to-date as possible. Out of date or inaccurate content will be removed from the website by the communications team. The communications team carry out a yearly audit of the website to ensure compliance.

Live pages must not be left empty or marked ‘under construction’. These pages can be hidden until ready to publish.

External links can direct users to additional useful information. NHS Kernow is not responsible for the content of external links but reasonable steps must be taken to ensure there are no links to harmful sites or those that could damage our reputation.

External links should open in a new window so users know they are accessing another site. They should also be checked regularly to ensure the content has not changed or been moved. Internal links however must remain in the same window.

Images must not breach copyright and can only be published with the permission of the owner. Images should also be uploaded in the right size and no larger than 1MB.

The Document Library is the home for all governed documents including policies, governing body papers, financial papers, Freedom of Information disclosure log, lists, registers and standing orders. All files and documents must have a meaningful name as the name may be the only context or reference if the document is printed or saved away from the website. For Document Library uploads, email kccg.corporategovernance@nhs.net.

7. Design

To maintain consistency and corporate identity standards, visual design, including colour and page layout, is controlled through in-built style sheets and templates within the website.

The communications team is responsible for implementing corporate identity guidelines and ensuring the design and templates continue to meet requirements.

Appendix 1: Equality impact assessment

Name of policy	Website management policy		
Department/ Section	Executive office	**Date of assessment**	28/11/2019
Person/s responsible for the assessment	Communications officer (digital and design)	**Is this a new or existing policy?**	Existing
1. Describe the aims, objectives and purpose of the policy.		To provide useful, efficient and accessible web services to staff and members of the public and other stakeholders. To ensure web content is up-to-date, accurate and relevant to the audience. To ensure NHS Kernow's brand and reputation is maintained. To ensure web services support other corporate strategies.	
2. Who is intended to benefit from this policy, and in what way?		The public and stakeholders will be able to view the most up-to-date content on a well maintained and useable site	
3. What outcomes are wanted from this policy?		Website is managed appropriately and effectively	
4. What factors/ forces could contribute/ detract from the outcomes?		The internet connection being lost, staff leaving, web company not fulfilling agreement.	
5. Who are the main stakeholders in relation to the policy?		NHS Kernow employees at all levels.	
6. Who implements the policy, and who is responsible for the policy?		Communications and engagement team	
7. What is the differential impact on people from the perspective of race, nationality and/ or ethnic origin? Does this have a positive or negative impact on black, Asian and minority ethnic (BAME)? Consider relevance to eliminating unlawful discrimination, promoting equality of opportunity and promoting good race relations between people of different racial groups. Issues to consider include people's race, colour and nationality,			

Gypsy, Roma, Traveller communities, employment issues relating to refugees, asylum seekers, ethnic minorities, seasonal workers, language barriers, providing translation and interpreting services, cultural issues and customs, access to services, prejudice, discrimination, harassment and abuse, attitudes towards accessing healthcare.	
No differential impact is anticipated on people from Black and Minority Ethnic groups.	
How will any negative impact be mitigated?	Not required.
8. What is the differential impact on people from the perspective of sex? Does this have a positive or negative impact on people who identify as male, female or intersex? Consider what issues there are for men and women, e.g. responsibilities for dependants, issues for carers, access to training and employment issues, attitudes towards accessing healthcare.	
No differential impact is anticipated on these groups.	
How will any negative impact be mitigated?	Not required.
9. What is the positive or negative differential impact on people from the perspective of disability? Consider what issues there are around disabilities, e.g. access to building and services, how we provide services and the way we do this, producing information in alternative formats and employment issues. Consider the requirements of the NHS Accessible Information Standard. Consider attitudinal, physical and social barriers. This can include physical disability, learning disability, autism, sensory impairment, mental health conditions, people with long term conditions, communication needs arising from a disability.	
Some people may struggle to use technology such as computers or smartphones	
How will any negative impact be mitigated?	Communications are also distributed via alternative channels. The website is designed to meet accessibility standards.
10. What is the differential impact on people from the perspective of sexual orientation? Does this have a positive or negative impact on people who identify as heterosexual, lesbian, gay, bisexual, pansexual or asexual? Consider what issues there are for the employment process and training and differential health outcomes amongst lesbian and gay people. Also consider provision of services, for example, older and younger people who identify as lesbian, gay, bi-sexual.	
No differential impact is anticipated on these groups	
How will any negative impact be mitigated?	Not required.

11. What is the positive or negative differential impact on people from the perspective of age? Consider what issues there are for the employment process and training. Some of our services impact on our community in relation to age, e.g. how do we engage with older and younger people about access to our services? Consider safeguarding, consent and child welfare, feelings of stigma and discrimination, lack of respect and social isolation.	
Some older people may not have access to the website.	
How will any negative impact be mitigated?	Communications are also distributed via alternative channels.
12. What is the positive or negative differential impact on people from the perspective of religion or belief? Consider what issues there are for the employment process and training. Also consider the likely impact around the way services are provided, e.g. dietary considerations, religious holidays, days associated with religious observance, culture and customs, places of worship. Consider what issues there may be for someone who has a religion or belief. Are they likely to be different to those faced by a person who does not hold a religious belief?	
No differential impact is anticipated on these groups	
How will any negative impact be mitigated?	Not required.
13. What is the positive or negative differential impact on people from the perspective of marriage and civil partnership? NB: this is particularly relevant for employment policies. This characteristic is relevant in law only to employment, however, NHS Kernow will strive to consider this characteristic in all aspects of its work. Consider what issues there may be for someone who is married or in a civil partnership. Are they likely to be different to those faced by a single person? What, if any are the likely implications for employment and does it differ according to marital status?	
No differential impact is anticipated on these groups	
How will any negative impact be mitigated?	Not required
14. What is the differential impact on people from the perspective of gender re-assignment? Does this have a positive or negative impact on people who identify as Trans/ transgender, non-binary or gender fluid? Consider what issues there are for people who have been through or a going through transition from one sex to another. How is this going to affect their access to services and their treatment when receiving NHS care? What are the likely implications for employment of a transgender person? This can include issues such as privacy of data and harassment, gender neutral language, dress codes.	

No differential impact is anticipated on these groups	
How will any negative impact be mitigated?	Not required
15. What is the differential impact on people from the perspective of pregnancy and maternity? Does this have a positive or negative impact on people who are pregnant, breast feeding mothers, or those on maternity leave? This characteristic applies to pregnant and breast feeding mothers with babies of up to six months, in employment and when accessing services. When developing a policy or services consider how a nursing mother will be able to nurse her baby in a particular facility and what colleagues may need to do to enable the baby to be nursed. Consider working arrangements, part-time working, infant caring responsibilities.	
No differential impact is anticipated on these groups	
How will any negative impact be mitigated?	Not required
16. Other identified groups: Consider carers, veterans, different socio-economic groups, people living in poverty, area inequality, income, resident status (migrants), people who are homeless or living in unstable accommodation, long-term unemployed, people who are geographically isolated, people who misuse drugs, those who are in stigmatised occupations, people with limited family or social networks, and other groups experiencing disadvantage and barriers to access.	
No differential impact is anticipated on these groups	
How will any negative impact be mitigated?	Not required
17. How have the core Human Rights Values of fairness, respect, equality, dignity and autonomy been considered in the formulation of this policy/ service/ strategy? If they haven't please reconsider the document and amend to incorporate these values. •	
People can access these tools without any barriers. They are treated with respect and trusted to maintain the website. Everyone has the opportunity to use the website or can be trained how to maintain it. Nothing will be displayed about an individual without their permission or that could criticise or degrade individuals. Everyone has the ability to choose when/if they use it.	
18. Which of the Human Rights Articles does this document impact?	
The right:	**Yes / No:**
• To life	No

• Not to be tortured or treated in an inhuman or degrading way	No
• To liberty and security	No
• To a fair trial	No
• To respect for home and family life, and correspondence	No
• To freedom of thought, conscience and religion	No
• To freedom of expression	No
• To freedom of assembly and association	No
• To marry and found a family	No
• Not to be discriminated against in relation to the enjoyment of any of the rights contained in the European Convention	No
• To peaceful enjoyment of possessions	No
19. What existing evidence (either presumed or otherwise) do you have for this?	N/A. This policy provides a framework for maintaining the site and ensuring stakeholders can access it.
20. How will you ensure that those responsible for implementing the policy are aware of the Human Rights implications and equipped to deal with them?	Not required.
21. Describe how the policy contributes towards eliminating discrimination, harassment and victimisation. Does this make the system fairer? Does it challenge, positively change the culture?	This policy is about website management rather than the direct safety, security or wellbeing of people.
22. Describe how the policy contributes towards advancing equality of opportunity. Are you using positive action to increase inclusion? Is this helping groups who may be less often heard?	This policy is about website management rather than the direct safety, security or wellbeing of people.

23. Describe how the policy contributes towards promoting good relations between people with protected characteristics. Does it educate, integrate, support?	This policy is about website management rather than the direct safety, security or wellbeing of people.
24. If the differential impacts identified are positive, explain how this policy is legitimate positive action and will improve outcomes, services and/ or the working environment for that group of people.	Not applicable
25. Explain what amendments have been made to the policy or mitigating actions have been taken, and when they were made.	Not applicable
26. If the negative impacts identified have been unable to be mitigated through amendment to the policy or other mitigating actions, explain what your next steps are using the following Equality Impact Assessment Action Plan.	Not applicable

Equality Impact Assessment Action Plan

Issues to be addressed	Action required	Responsible person	Timescale for completion	Action taken	Comments

Signed (completing officer): Leanne Baker

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Date: 16 March 2020

Signed (Head of Department/ Section): Sarah Fisher

Date: 30 March 2020

Please ensure that a signed copy of this form is sent to both the corporate governance team with the policy and the Equality and Diversity lead.