# **RNLI Media Policy**



## **Policy Owner**

Jayne George

Fundraising, Marketing and Media Director

#### **Last Updated**

New policy

### **Owning Department**

Fundraising, Marketing and Media

#### **Next Review Date**

Three years from publish date

#### **Reason for Policy**

This policy sets out how RNLI staff and volunteers should work with the media, celebrities and politicians. It also explains how we manage video and images, including consent.

# **Objective of Policy**

To protect RNLI staff and volunteers in their dealings with the media and while working with video and images. To help protect the reputation of the RNLI.

#### **Applicability**

All RNLI staff and volunteers.

#### Introduction

Working with the media and managing social media engagement are key to enhancing and protecting the RNLI's reputation and raising awareness of our charity's work. The RNLI's Media Engagement team is committed to responding as openly, accurately and promptly as possible to media enquiries and to keeping the media informed about our rescue, prevention and fundraising activities.

Well-managed social media channels help us communicate with supporters and the public, and volunteers and staff must follow guidance and policy if they are talking about the RNLI on their own social media. It is also important that the RNLI protects our staff and volunteers' rights to privacy and the confidentiality of those we rescue, and that we comply with data protection and consent laws when sharing images and information.

This policy provides information on the following subjects and is supplemented by specific guidance on these subjects, as well as by the LPO Handbook:

- The RNLI's reputation our professional responsibilities
- Working with the media
- Film and image
- Camera operations procedures, GDPR and consent
- Political activity and pre-election period
- Celebrity and VIP visits
- Contact with the Royal Family

Social media is covered in a separate policy and guidance, which must be read and followed in conjunction with the Media Policy.

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Job Title: Regional Media Engagement Manager

Department: Media Engagement

# **Media Policy**

#### 1. RNLI REPUTATION

- 1.1 The RNLI is fortunate to have a strong reputation as a well-respected, valued charity and vital rescue organisation a reputation built since 1824. Damage to our reputation could potentially make it much more difficult to raise funds and continue our work, so it is crucial we all do what we can to protect it.
- 1.2 Everyone who works or volunteers for the RNLI has a role as an ambassador for our charity. This is about more than speaking publicly about the work of the RNLI we should all uphold our charity's reputation at all times by behaving professionally and respectfully when we are acting on behalf of or in association with the RNLI.

#### The RNLI Code of Conduct/Volunteer Code of Conduct

- 1.3 The RNLI Code of Conduct and Volunteer Code of Conduct spell out the behaviour expected of our staff and volunteers. By complying with these standards, we can all help to protect and enhance the RNLI's reputation.
- 1.4 Any form of behaviour or communication which does not comply with these standards, or with other RNLI policies listed below, risks bringing the RNLI into disrepute. As well as potential damage to the RNLI's reputation, resulting in loss of support and funds, this could result in a disciplinary procedure or use of the volunteer problem solving process, which may result in dismissal or standing down.
- 1.5 Concerns about any inappropriate behaviour should be escalated to line managers/volunteer managers or the People Department. The RNLI has a support network, Channel, which can be contacted by email at <a href="mailto:Channel@RNLI.org.uk">Channel@RNLI.org.uk</a>

#### 2. WORKING WITH THE MEDIA

2.1 In general, the RNLI has a very positive relationship with the media but engagement must be carefully managed. Getting it wrong risks damaging our reputation or, if confidential information is released, breaking the law.

#### Who can talk to the media?

- 2.2 Only members of the Media Engagement team, volunteer Lifeboat Press Officers (LPOs) and Engagement volunteers who have carried out RNLI media training are authorised to contact and speak directly to the media. Other staff and volunteers can give media interviews only after approval and briefing from the Media Engagement team. However, journalists may approach us via other routes on social media, for example, or directly to a staff member or volunteer rather than through the RNLI Media Engagement team.
- 2.3 To ensure the correct process is followed, any media enquiries received by RNLI staff and volunteers must be sent to the Press Office (<a href="mailto:pressoffice@rnli.org.uk">pressoffice@rnli.org.uk</a> / (0044) 01202 336789), a member of the Regional Media Team or, at lifeboat stations, to the LPO.
  - Someone is available on the Press Office number 24/7 (a duty Press Officer is on call outside normal office hours). The Press Office, Regional Media Engagement team or LPO must be informed of all media requests before any interviews or filming are agreed or any information is sent to the media.
- 2.4 LPOs play a key role in helping to raise awareness of the RNLI and specifically their lifeboat station's activity in the local community. This is mainly done by publicising rescues and other lifeboat station activity, but also

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by supporting the work of the wider RNLI Media Engagement team. LPOs undergo competency-based training and assessment on a wide range of skills and subjects. More information about their role is found in the LPO Handbook.

2.5 Engagement volunteers should liaise with their Community Manager about proposed media activity.

#### Transparency, accuracy and our legal requirements

- 2.6 The RNLI is committed to being transparent so that the public, supporters, volunteers and staff can see what the charity does and how supporters' donations are spent. The RNLI must also ensure the information it shares with the media, public and supporters is consistent, accurate and reflects the organisation's values, actions and stance. Trust is quickly eroded if information is shown to be inaccurate or inconsistent with the charity's culture and values, so it is important the organisation maintains oversight of what is being said or released on its behalf.
- 2.7 In some cases, there are legal reasons for not releasing information, including GDPR, police involvement, commercial agreements etc. There may also be ethical reasons for not releasing information and images, for instance following launches to vulnerable people and cases of self-harm.
- 2.8 It is also important that information released to the media or shared publicly is measured, factual and nonjudgemental. We never criticise the people we rescue or comment on other organisations or agencies.

## Media law and regulations

- 2.9 Newspapers, publishers and broadcasters are governed by laws, regulations and guidelines. These support the freedom of the media to report on subjects that are in the public interest and to provide comment and opinion on subjects in the news. But they also protect the public with laws around privacy, decency and defamation (falsely accusing an individual of something that they have not done). It is worth being aware that it is very hard, and sometimes counterproductive, to stop publication of a story unless there is a clear legal case against the publisher. Even then, some media have been known to 'publish and be damned' taking the risk that an organisation or individual will not take them to court to avoid further publicity.
- 2.10 The RNLI, which shares information on social media and its own website, is also classed as publisher so is subject to these regulations and guidelines. Following training, guidance and policy will help the RNLI protect its volunteers and staff from accidentally breaching these regulations. The RNLI's Media Engagement team can provide guidance, support and act on behalf of the RNLI to negotiate this complicated regulatory environment and must be informed of any approach by the media to RNLI volunteers or staff.
- 2.11 There are also guidelines that inform how the media should behave, including how they treat individuals and what actions can be taken against press harassment. Any concerns around media attention or harassment by the press should be notified to the RNLI Media Engagement team immediately. GU1167 Media and **Communication** provides the link to the appropriate Codes of Practice.

# Media on board our lifeboats

2.12 Members of the media sometimes ask to go afloat on our lifeboats to film and photograph activity to support coverage about the RNLI. In Ireland, legislation means only enrolled RNLI lifeboat crew or personnel engaged in operational duties related to the business of the vessel are permitted to go afloat on our lifeboats. In the UK, non-operational personnel and members of the public – including the media – may sometimes be allowed to go afloat on all-weather lifeboats, inshore rescue hovercraft, Atlantic 85s and E class lifeboats. They are never allowed on other classes of inshore lifeboat.

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2.13 Such requests must be discussed with the ALM and Regional Media Engagement team or, if they are not available, the Press Office. Requests must be in line with current RNLI policy **PO1023 Non-operational Personnel on RNLI Lifeboats**.

# Managing major incidents and issues

- 2.14 The media are interested in news about major rescues and incidents but are also drawn to negative stories, bad news and issues which could potentially be damaging to the RNLI's reputation. For this reason, it is very important the Press Office and/or Regional Media team are informed about any major incident or issue which could potentially generate media interest, so they can properly manage the RNLI's response. These include:
  - Major rescue or large search involving multiple lifeboats
  - Multi-casualty rescue
  - Crew injury
- Lifeboat breakdown, damage or capsize
- Injury to a member of the public during a rescue, at a lifeboat station or during RNLI event
- Criminal activity involving a staff member or volunteer
- Financial impropriety
- Serious dispute within a lifeboat station/branch/lifeguard unit
- Inappropriate discussions/material shared on social media.

#### 3. FILM, IMAGE AND AUDIO

- 3.1 Video, images and audio clips of RNLI rescues and other activity are one of the best means we have of promoting the work of our charity and we encourage lifeboat crew members and lifeguards to capture footage during rescues and exercises. It is very important, though, that before any footage is posted online, shared on social media or sent to the media or third parties, including RNLI partners, it is first uploaded to the RNLI's video library, the Source, and approved by the Press Office. This is to protect both the RNLI and individuals from unwittingly showing poor operational practices or breaching regulations, including data protection. It also helps the RNLI maintain control of our footage.
- 3.2 Uploaded video footage requires moderation to ensure the content shown is operationally correct and compliant, does not contain sensitive or graphic details and is appropriate to share with the wider public.
- 3.3 All images of RNLI people, vessels and activity must follow the RNLI guidelines, for lifeboats and lifeguards

# **Consent and GDPR**

- 3.4 Informed consent must be obtained from anyone identified in a rescue video before it can be shared publicly. This is an ethical requirement but the introduction of General Data Protection Regulations (GDPR) means it is also a legal requirement, with greater focus on protecting individuals' personal data. Any footage identifying an individual is classed as personal data. These regulations mean the RNLI must treat people's personal data correctly. This includes capturing, editing and storing footage as well as gaining the appropriate consent. Failure to do this could result in a large fine and damage to the RNLI's reputation. Without consent, the RNLI will not be able to use a lot of the rescue footage captured.
- 3.5 GDPR requires consent to be freely given, specific, informed and unambiguous. Ideally, we would ask for consent before we started filming, but the nature of our work means that it is not possible to do this midrescue. Likewise, capturing full, informed consent at the end of a rescue is not appropriate. Instead, crew members and lifeguards should capture contact details of the rescuee, or their companions or guardian, so that the RNLI Media Engagement team can gain consent at a later date. We must wait at least 24 hours to

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make this contact, to ensure a casualty is able to make a properly informed decision about consent. Current policy and guidance are available in 'Camera Operations Procedures, GDPR and Consent'.

- 3.6 Without consent, footage can still be used if it can be edited to remove any shots which identify an individual.
- 3.7 To ensure personal data is always protected, it is important that we follow a process for securely storing any footage captured:
- If consent to use the footage has been given, it should be stored on the lifeboat station's computer or a secure hard drive.
- If consent is explicitly withdrawn or denied, footage which clearly identifies someone should be deleted, unless there is a possibility of a legal investigation (e.g. MAIB investigation, insurance claim) or RNLI investigation. In these circumstances, footage can be stored on a secure hard drive for 6 months.
- If consent can not be obtained (e.g. the individual does not reply or cannot be contacted), footage can be stored on a secure hard drive for 6 months.

## **Assigning footage rights**

3.8 The introduction of General Data Protection Regulations (GDPR) also means the RNLI must obtain the legal right to use any footage taken by our volunteers. Anyone using RNLI or personal camera equipment to film rescues and exercises must assign the rights to the RNLI before the footage can be used by the RNLI. More information and the relevant form are available in Assigning Footage Rights.

# Requests from photographers and film makers

3.9 RNLI lifeboat stations, lifeguard units and other RNLI locations may receive requests from amateur or professional photographers and film makers who want to take photos or make a film of RNLI activity. In this situation, RNLI staff and volunteers must contact the RNLI Press Office or Regional Media Engagement team who will decide if the request can be facilitated and ensure the correct procedures, risk assessments, consent and indemnities are in place to protect all those involved should the filming/photography go ahead. Unsanctioned images of RNLI people or assets can potentially be sold via licensing agencies or used in the media. In this situation, the RNLI would have no control over how or where the images are used. See the RNLI Film and Image Policy for more information.

# **Drones**

3.10 The RNLI has experienced an increasing demand for the use of drones to film operational activity and recognises both the opportunities and risks the technology offers. Drones can cause injury or damage to people and property and can breach data protection regulations if not used responsibly. As a result, drone use is subject to safety rules and legislation with which the RNLI must comply. For information, see Drone policy and guidance.

## Copyright

3.11 Uncredited imagery can be a risk to the RNLI due to copyright and usage rights. We must never use images, including on social media, without crediting the photographer or checking if we have the rights to the image. Any material offered to the RNLI by a third-party photographer/film maker can be referred to the Creative Team for advice. Specific permission from the owner must be provided in writing and must define what is acceptable use. The Rights Assignment form should be used for this.

#### Film and image requests

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3.12 Staff or agencies working on behalf of the RNLI who require new film or image material must discuss the issue with the <a href="Creative Team">Creative Team</a> in advance of any commission being made.

#### 4. RNLI ISSUED CAMERAS AND OTHER EQUIPMENT

4.1 RNLI issued cameras are an important asset and provide valuable images to help promote our charity's work. Their use during operational activity on lifeboats is covered in a new **Use of Cameras and Mobile Phones**Whilst Afloat Policy, which is due to be published shortly by the Lifesaving Operations team. This will replace the interim Use of Mobile Phones on RNLI Lifeboats policy.

## 5. POLITICAL ACTIVITY

- 5.1 The RNLI is bound by charitable and election law and must be seen to be independent from party politics. RNLI staff and volunteers are, of course, entitled to their individual political views but we ask that they do not take part in political activity while acting in their RNLI capacity or where they may be perceived as representing the RNLI (eg taking part in a demonstration or political event while wearing branded clothing). RNLI staff and volunteers must not take part in any activity that could link the RNLI to a political party or cause without the permission of the Chief Executive's Office.
- 5.2 Lifeboat stations and fundraising branches sometimes have relationships with local politicians. While this is not discouraged (outside election periods), it is helpful for ALMs/Community Managers to be made aware of discussions with local politicians, in case they can support or advise on other RNLI activity (eg water safety work). Permission for politicians to visit a lifeboat station or other RNLI asset must be sought from the Chief Executive's Office.

#### **Elections**

5.3 In the run up to an election, the RNLI abides by pre-election period regulations. During this period, activities that could be seen to influence how people vote at the election are scrutinised and restricted. For this reason, we are more cautious than usual about approaches from politicians and their supporters at this time. Candidates or their supporters may ask to visit a lifeboat station, lifeguard unit or fundraising event and to speak with volunteers and staff, as part of their campaign. This might be to show their support for the RNLI or to learn more about the station/lifeguards/fundraising. Any such request should be forwarded to the Chief Executive's Office, the Press Office or a member of the Media Engagement team. See PO1032 Political Demonstrations and Elections for more detail.

# 6. CELEBRITY, SOCIAL MEDIA INFLUENCER AND VIP RELATIONS/ENGAGEMENT

- 6.1 The Media Engagement team monitor celebrity and social media influencer activity linked to the RNLI. Anyone who would like to engage with celebrities, influencers or ambassadors must, before making contact or a new request, discuss the matter with the Press Office at <a href="mailto:pressoffice@rnli.org.uk">pressoffice@rnli.org.uk</a> and/or Social Media team at <a href="mailto:social@rnli.org.uk">social@rnli.org.uk</a>
- 6.2 Remember the importance of due diligence prior to approaching a celebrity or social media influencer the RNLI's reputation must always be the priority and associating with celebrities with a negative past can impact this.
- 6.3 The RNLI does not pay celebrities or social media influencers to support the charity.

For further guidance you can contact the press office at <a href="mailto:pressoffice@rnli.org.uk">pressoffice@rnli.org.uk</a> / (0044) 01202 336789 or Social Media team via <a href="mailto:social@rnli.org.uk">social@rnli.org.uk</a>

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#### 7. THE ROYAL FAMILY

7.1 The RNLI is fortunate to enjoy Royal patronage and has a special relationship with members of the Royal Family, many of whom have visited lifeboat stations and other RNLI sites. This relationship is carefully managed by the Chief Executive's Office – engagement with any member of the Royal Family, Lord-Lieutenant's representative or their staff must first be approved by the Chief Executive's Office.

#### **Reference Documents**

LPO Handbook

# **Related Policies, Procedures & Guidance**

Social Media Policy

Use of Cameras and Mobile Phones Whilst Afloat to follow

**GU1167 Media and Communication** 

PO1023 Non-operational Personnel on RNLI Lifeboats.

PR1078 Camera Operations Procedures, GDPR and Consent

Film and Image Policy

**Assigning Footage Rights** 

PO1003 - Drones

PO1032 Political Demonstrations and Elections

## **Related Forms & Instructions**

**Rights Assignment form** 

RNLI Film and Photography Guidelines – Lifeboats RNLI Film and Photography Guidelines - Lifeguards

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