



## Standard Operating Procedure for Public Statements

# **BACCN Standard Operating Procedure for Public Statements**

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| <b>Version no.</b> | <b>Version Date</b> | <b>Written by</b> | <b>Changes from previous version</b> |
|--------------------|---------------------|-------------------|--------------------------------------|
| 1                  | 11/09/2026          | Rebecca Sumnall   | New document                         |
|                    |                     |                   |                                      |

# **BACCN Standard Operating Procedure for Public Statements**

## **Introduction**

The British Association of Critical Care Nurses (BACCN) is committed to promoting education, professional development, collaboration and excellence in critical care nursing. BACCN is also committed to fostering a professional community that values dignity, respect, inclusion, integrity and accountability.

BACCN may issue public statements on matters relevant to critical care nursing, patient safety, the nursing profession, BACCN members or BACCN's charitable objects, aims and organisational priorities. A public statement may be initiated by BACCN or issued in response to a significant external event, publication or development.

BACCN will not routinely issue a public statement solely because a matter is prominent or serious. Any decision to issue, or not issue, a statement must be relevant, proportionate and consistent with BACCN's role as a professional nursing organisation.

Public statements should reflect BACCN's professional responsibilities, values and organisational position. Once approved, a statement represents the collective position of BACCN rather than the personal views of individual Board Directors.

## **Purpose**

The purpose of this standard operating procedure is to provide a clear, consistent and auditable process for considering, drafting, approving and publishing public statements on behalf of BACCN.

The procedure supports timely decision-making while protecting professional standards, organisational accountability, inclusion, confidentiality and BACCN's reputation.

## **Scope**

This SOP applies to BACCN Board Directors, committee members, volunteers, contractors, consultants, representatives, staff where applicable, and partner organisations involved in proposing, drafting, reviewing, approving, formatting or publishing a public statement on behalf of BACCN.

It applies to statements initiated by BACCN and responses to external events, publications or developments. It covers statements published through the BACCN website, newsletters, social media, press or media channels, partner communications, or any other public platform using the BACCN name or brand.

This SOP does not apply to routine promotional, informational or operational communications, unless the content could reasonably be understood as a formal BACCN position or public statement.

This SOP does not replace urgent safeguarding, legal, regulatory, data protection, professional registration or emergency reporting routes. These routes must be followed where required.

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## Definitions

| Term                          | Definition                                                                                                                                                        |
|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Public statement</b>       | A formal communication issued in BACCN's name that expresses a position, response, comment, concern, recommendation or commitment intended for a public audience. |
| <b>Board of Directors</b>     | The BACCN Board of Directors, being the governing body of BACCN and the body described as the National Board within the Articles of Association.                  |
| <b>Board</b>                  | The BACCN Board of Directors.                                                                                                                                     |
| <b>Board Director</b>         | An individual appointed or elected to the BACCN Board of Directors.                                                                                               |
| <b>Executive Board Member</b> | A Board Director holding an Executive governance role within BACCN.                                                                                               |
| <b>Proposer</b>               | The Board Director asks the Board to consider issuing a public statement.                                                                                         |
| <b>Drafting lead</b>          | The person appointed to prepare and coordinate the draft statement.                                                                                               |
| <b>Communications Lead</b>    | The Board Director or delegated person responsible for coordinating BACCN communication activity.                                                                 |
| <b>ECHO</b>                   | BACCN's delegated publication and formatting support provider.                                                                                                    |
| <b>Final approved version</b> | The version clearly identified as final and explicitly approved through the process set out in this SOP.                                                          |
| <b>Substantive change</b>     | A change that alters the meaning, position, emphasis, commitment, factual content or professional interpretation of an approved statement.                        |

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## Roles and Responsibilities

The BACCN Board of Directors holds overall responsibility for ensuring that this SOP is implemented, monitored and reviewed effectively. Operational responsibility may be delegated, but ultimate accountability for compliance and assurance remains with the Board.

| Role or group                      | Responsibilities                                                                                                                                                                                                                                                                          |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Board of Directors</b>          | Considers whether a public statement is required; reviews the proposed wording; declares and manages conflicts of interest; provides explicit approval; ensures the statement is consistent with BACCN's role, policies and charitable objects; and receives assurance on implementation. |
| <b>Executive Board member</b>      | Provides Executive oversight and forms part of the minimum approval threshold.                                                                                                                                                                                                            |
| <b>Chair</b>                       | Supports proportionate governance and escalation; helps manage urgent, sensitive or high-risk matters; and coordinates with the Communications Lead where required.                                                                                                                       |
| <b>Communications Lead</b>         | Coordinates the process where delegated; supports accurate presentation and use of BACCN branding; coordinates press statements with the Chair where required; and liaises with ECHO on publication.                                                                                      |
| <b>Proposer</b>                    | Sets out why a statement should be considered, its intended purpose and audience, relevant timing, and any known sensitivities or implications.                                                                                                                                           |
| <b>Drafting lead</b>               | Prepares and updates the draft; checks sources and factual accuracy; records material changes; identifies the final version; and retains the approval record.                                                                                                                             |
| <b>Professional or policy lead</b> | Provides subject-specific advice where the statement concerns clinical practice, professional standards, safeguarding, equality, finance, data protection, research, events or another policy area.                                                                                       |
| <b>ECHO</b>                        | Formats and publishes the final approved version. ECHO must not make substantive changes without referring the wording back to the Board.                                                                                                                                                 |
| <b>All involved</b>                | Maintain confidentiality before publication, protect personal data, disclose conflicts of interest, use reliable sources and avoid sharing draft wording outside the agreed process.                                                                                                      |

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## Key Principles and Requirements

- Public statements must be relevant to critical care nursing, patient safety, BACCN members, the nursing profession, or BACCN's charitable objects, aims and organisational priorities.
- BACCN must have a meaningful, appropriate and evidence-informed contribution to make.
- Decisions must be proportionate, transparent and consistent with BACCN's role and remit.
- Content must be accurate, clear, respectful, inclusive and suitable for the intended audience.
- Potential professional, legal, regulatory, safeguarding, equality, data protection, financial, partnership and reputational implications must be considered where relevant.
- Draft statements must remain confidential until approved and published, unless wider consultation has been authorised.
- Only the final approved version may be published in BACCN's name.

## Process for considering and issuing a public statement

| Stage                        | Required action                                                                                                                                                                                    | Record or outcome                                                                                          |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| <b>Proposal</b>              | Any Board Director may propose a public statement. The proposal should identify the issue, relevance to BACCN, intended purpose and audience, timing, available evidence, and known sensitivities. | Proposal recorded through the agreed Board communication or decision route.                                |
| <b>Initial consideration</b> | The Board, Chair or delegated group considers whether BACCN has a meaningful contribution to make and whether a statement is consistent with BACCN's role and remit.                               | Decision to proceed, seek further information, use another communication route, or take no further action. |
| <b>Lead and route</b>        | A drafting lead is identified. Relevant professional, governance or policy advice is sought. Any conflict of interest is declared and managed.                                                     | Named drafting lead, contributors and approval route.                                                      |

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| Stage                          | Required action                                                                                                                                                                                                              | Record or outcome                                                              |
|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| <b>Drafting and checks</b>     | The draft is written in clear language. Facts, references, quotations, permissions and relevant policy considerations are checked. Personal or confidential information is excluded unless lawful, necessary and authorised. | Version-controlled draft and source record.                                    |
| <b>Board review</b>            | The draft is circulated for discussion and amendment. Material comments are resolved, and the final version is clearly identified.                                                                                           | Final version ready for explicit approval.                                     |
| <b>Approval</b>                | The final version must receive explicit approval from at least four Board Directors, including at least one Executive Board member. Silence, lack of objection or non-response do not constitute approval.                   | Documented approvals linked to the final version.                              |
| <b>Publication</b>             | Once the threshold is met, the Communications Lead or delegated person may send the final approved version to ECHO for formatting and publication.                                                                           | Published statement and publication record.                                    |
| <b>Post publication review</b> | Any correction, complaint, significant response, emerging risk or change in evidence is reviewed and escalated where necessary.                                                                                              | Correction, update, withdrawal, learning or no further action, as appropriate. |

## Decision criteria

Before drafting begins, the following questions should be considered:

- Is the matter relevant to critical care nursing, patient safety, BACCN members, the nursing profession, or BACCN's charitable objects, aims or priorities?
- Does BACCN have a meaningful and appropriate contribution to make?
- Is a formal public statement the most suitable communication route?
- Is the proposed position supported by reliable and current information?
- Is the proposed statement consistent with BACCN's role, remit and wider policy suite?
- Have professional, legal, regulatory, safeguarding, equality, inclusion, accessibility, data protection, financial,

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partnership and reputational implications been considered where relevant?

- Could issuing, delaying or not issuing a statement create foreseeable risk or misunderstanding?
- Does BACCN need advice, consultation or permission before proceeding?
- Is the intended audience clear, and is the statement accessible to that audience?
- Can the statement be approved and published while it remains relevant and timely?
- Could issuing a statement unintentionally imply a position beyond BACCN's remit?
- Have Board Directors had a reasonable opportunity to contribute, challenge and raise substantive concerns?
- Not every matter relevant to BACCN or the nursing profession requires a public statement. The decision and rationale should be recorded proportionately, particularly where the matter is sensitive, high-profile or time critical.

## **Discussion, dissent and decision-making**

- BACCN recognises that legitimate professional disagreement may arise when considering whether and how to make a public statement.
- Board Directors are encouraged to raise concerns and, where necessary, express strong or principled objections. Objections should be considered respectfully and on their merits. Disagreement is a legitimate part of good governance and should not be regarded as obstructive or disloyal.
- The Board should seek to understand and address substantive concerns before making a final decision. Where appropriate, it should consider amendments in response to concerns raised.
- Where practicable, the Board should seek consensus on the wording and whether a statement should be issued. Where consensus cannot reasonably be reached, the matter should be determined through a formal Board decision in line with the approval requirements in this SOP.
- A Board Director may dissent from a decision while respecting the collective decision-making process. Where a significant or substantive objection remains unresolved, it should be acknowledged and, where appropriate, recorded in the Board's records. The existence of dissent does not prevent approval where the required decision-making threshold has been met.

## **Drafting standards**

- State clearly why BACCN is commenting and what the statement is intended to achieve.
- Use plain, professional and respectful language.
- Distinguish fact, evidence, professional opinion and organisational position.
- Use reliable and current sources. Check all names, titles, dates, figures, quotations and references before

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approval.

- Avoid speculation, unsupported claims, discriminatory language, personal criticism and unnecessary disclosure of confidential or personal information.
- Consider equality, diversity, inclusion and accessibility throughout drafting and publication.
- Identify any action, recommendation, limitation or next step clearly.
- Include a publication date and contact route where appropriate.
- Use the BACCN name and branding only in line with approved arrangements.

## **Approval and publication controls**

- The final version must be clearly labelled and distinguishable from all earlier drafts.
- Approval must relate to the exact final wording. Approval must be explicit and recorded.
- At least four Board Directors must approve the final version, including at least one Executive Board member.
- A person with a material conflict or interest must not take part in approving the statement unless the Board has agreed and recorded an appropriate way to manage the conflict.
- If the approval threshold is not met, the statement must not be published.
- ECHO may choose presentation and formatting but must not make a substantive change without referral back to the Board.
- Any substantive change after approval requires the revised final version to go through the approval process again.
- Minor formatting, spelling or typographical corrections that do not alter meaning may be made before publication. These should be checked by the Communications Lead or drafting lead.
- The published version should be retained with the approval record and relevant source material.
- In addition to the minimum approval threshold, the Board should seek to establish majority support through the agreed decision-making process.
- An abstention does not constitute approval.
- Where a formal vote is required, the outcome and, where appropriate, any significant dissent should be recorded.

## **Conflicts of interest**

- Board Directors should declare any actual, potential or perceived conflict of interest relevant to a proposed public statement.
- Where a conflict is identified, the Board should determine whether the Board Director may participate in

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discussion, drafting or approval, taking account of the nature and significance of the conflict.

- Any significant conflict and the resulting decision should be recorded.

## **Timelines and urgent statements**

- Public statements should be considered and approved within a timeframe appropriate to the nature of the matter. Where a statement is time-sensitive, Board Directors should aim to reach a decision promptly so that the statement remains relevant and useful.
- Where an event, publication or development is known in advance, the likely need for a statement should be considered early. Drafting, advice, review and approval arrangements should be planned beforehand wherever practicable.
- Urgency should not be used routinely to bypass appropriate Board scrutiny or decision-making. Where the usual process cannot reasonably be completed within the required timeframe, the Executive Board may determine an appropriate alternative approval process. Any alternative process should, wherever practicable, involve appropriate Board representation, allow relevant Board Directors to raise significant concerns, maintain the minimum approval requirements, and be documented and reported to the full Board at the earliest opportunity.

## **Corrections, updates and withdrawal**

- A factual error, significant ambiguity, legal or regulatory concern, safeguarding issue, data protection concern or material change in evidence must be escalated promptly to the Chair and Communications Lead.
- A correction or update that changes meaning must be approved through the same process as a new statement.
- A minor correction that does not change meaning may be authorised by the Communications Lead or drafting lead and should be recorded.
- The Board may withdraw or archive a statement where it is no longer accurate, appropriate or consistent with BACCN's position. The reason and decision should be recorded.
- Where appropriate, the published page should state that the statement has been corrected, updated, superseded or withdrawn.

## **Reporting Concerns**

Anyone who becomes aware of a concern about a proposed or published statement should report it promptly through the relevant BACCN route. Concerns may be raised with the Chair, a Board Director, the Communications Lead, the relevant professional or policy lead, or through the formal complaints process.

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| Concern type                                                         | Likely route                                                            |
|----------------------------------------------------------------------|-------------------------------------------------------------------------|
| <b>Factual accuracy, misleading wording or source concern</b>        | Drafting lead, Communications Lead or relevant professional lead.       |
| <b>Conduct, discrimination, harassment or inappropriate language</b> | Chair, Board Director, EDI lead or formal complaints process.           |
| <b>Safeguarding, health and safety or immediate risk</b>             | Safeguarding lead, emergency services or relevant urgent route.         |
| <b>Confidentiality, privacy or personal data</b>                     | Designated data protection route and Chair where appropriate.           |
| <b>Legal, regulatory or professional standards concern</b>           | Chair, relevant professional lead and external advice where authorised. |
| <b>Conflict of interest, governance or reputational risk</b>         | Chair or Board.                                                         |
| <b>Concern about a published statement</b>                           | Communications Lead, Chair or formal complaints process.                |

Immediate risks to life, safety or welfare must be escalated through the appropriate emergency or safeguarding route without delay. This SOP must not be used to delay any required legal, regulatory or professional notification.

## Confidentiality and Data Protection

BACCN will handle draft statements, source material, consultation responses, approvals, concerns and related records sensitively, fairly and confidentially. Information will only be shared with those who need it to draft, advise, review, decide, publish or resolve a concern.

All personal information and records must be managed in line with UK GDPR, applicable legislation and BACCN data protection requirements. Records should be accurate, proportionate, retained securely and limited to what is necessary.

Draft statements must not identify an individual or disclose confidential, sensitive or personal information unless there is a lawful basis, a clear need, appropriate advice and explicit authorisation. Where information must be shared for safeguarding, legal, regulatory, insurance or risk-management reasons, the relevant route must be followed.

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## **Record Keeping**

The Board should retain a proportionate record of:

- The reason for considering a public statement
- The final approved wording
- The decision-making and approval process, including any formal vote
- Any significant conflicts of interest and how they were managed
- Any significant unresolved objections or dissent, where appropriate
- The date and manner of publication
- Any subsequent correction, update, withdrawal or review.

The Communications Lead or delegated lead should maintain the record in line with BACCN's governance, confidentiality, data protection and record-keeping arrangements.

## **Monitoring and Assurance**

The Board will seek proportionate assurance that this SOP is followed and that learning informs future communication and governance. Monitoring should protect confidentiality and personal data.

Any complaint, significant challenge, correction, legal or regulatory concern, or reputational issue should be escalated to the Board or relevant lead.

The Board should review themes, implementation issues and learning periodically and when this SOP is reviewed.

Learning should inform future drafting, approval arrangements, communication practice, policy review and Board assurance.

## **Related Documents**

This SOP forms part of the BACCN policy suite and should be read in conjunction with other relevant BACCN policies and procedures, including:

- Articles of Association
- BACCN Board of Directors Member Information Pack
- Equality, Diversity and Inclusion Policy
- Code of Conduct, Health and Safety and Safeguarding Policy
- Conference Code of Conduct and Safeguarding Policy
- Data Protection Policy
- Complaints Policy
- Finance Policy

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- Website Policy
- BACCN branding and communication procedures
- Any relevant professional guidance, regulatory requirements and associated operational procedures
- Where policies overlap, the more specific policy will apply to the immediate situation while remaining consistent with overarching BACCN principles and governance arrangements.

## **Review**

This SOP will be reviewed by the BACCN Board at least every three years, or sooner where there are changes in legislation, regulatory requirements, professional guidance, organisational arrangements, communication channels, supplier arrangements, monitoring findings, complaints, incidents or feedback indicating that revision is required.

The review should consider whether the approval threshold, decision criteria, publication controls, record keeping and escalation routes remain clear, proportionate and effective.