



Social Media Policy

REF NO. CS02

Additionally refer to:

- Freedom to Speak Up: Raising Concerns (Whistleblowing) Policy
- W7 Disciplinary Policy
- IG02 Data Protection, General Data Protection Regulations (GDPR) and Confidentiality Policy
- Freedom of Information Policy (including re-use of public sector information & environment information regulations)

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1 Policy on a Page – Key Points

- The Trust currently uses social media as a tool to engage with the public, staff, media and other stakeholders to deliver positive, key messages for good healthcare and services. Staff are encouraged to follow, support and promote it.
- The Trust recognises that many staff enjoy the benefits of using social media in a personal and professional capacity. The Social Media Policy provides guidance and gives some general rules and best practices which you should abide by at all times.
- When an employee or worker is using social media, whether or not they have identified themselves as having an association with the Trust, they are expected to behave appropriately at all times and in a manner that is consistent with the Trust's values and policies.
- Staff should also be aware and follow the requirements of their professional body in relation to the use of social media, for example GMC, NMC
- Employees who are found to breach this policy may be managed in line with the Trust's Disciplinary Policy. Relevant misconduct may constitute gross misconduct and may result in dismissal.

Staff should use their own discretion and common sense when engaging in online communication. The following guidance gives some general rules and best practices which you should abide by at all times. Employees and workers, when using social media or any on-line communication, must:

- Avoid sharing any information that could breach patient or staff confidentiality.
- Do not engage in any activities on the internet or share information which might bring the Trust into disrepute;
- Refrain from altering online sources of information on websites such as Wikipedia from a Trust perspective, unless directly permitted by the Communications Team;
- Do not post defamatory, derogatory, offensive, or abusive comments on the internet or social media about colleagues, patients, and/or volunteers and their work or the Trust;
- Avoid the use of explicit language that might reasonably be expected to cause offence;
- Do not post misleading or incomplete information that may influence the public to donate money or gifts to the Trust or to themselves;
- Employees should not post content that could be seen as disrespectful in relation to the care we give, or interpreted in such a way by patients, patients loved ones or fellow staff members
- Avoid posting photos or images of patients or carers, even if requested to do so, unless this forms part of an ongoing Communications-approved campaign for which you have authority to work on.
- Direct any media interest following a social media post to the Trust's communications team.
- Staff should be aware that even if they have secure privacy settings on their personal account that if they are members of a group, all the other members will have the ability to see and use contact details.

For further support, advice or guidance regarding this policy please email sath.commsteam@nhs.net for more information.

2 Document Statement

The purpose of this policy is to make our employees, workers and volunteers fully aware of the relevant Trust expectations in the context of their personal and professional use of social media. This policy covers the use of social media through personal devices. The use of Trust owned devices is addressed in the IT [Acceptable Use Policy](#). This policy will reduce the risks to the Trust associated with the use of social media by:

- Aiming to ensure the confidentiality of personal information relating to patients, carers, employees, workers, volunteers and others associated with the Trust.
- Aiming to ensure compliance with relevant data protection, copyright and defamatory legislation.
- Prohibiting the publication of material on social media sites that would damage the reputation or give inaccurate/misleading information about the Trust, its employees, workers or volunteers.
- Preventing the use of offensive language or antisocial behaviour by members of staff, workers and volunteers that might damage the reputation of the Trust

3 Overview

The world of communication is changing and the Trust aims to be a dynamic organisation embracing new technologies and ways of working. The rise of social media is changing the way we, and every organisation in the world conducts its business. Millions of people use social media everyday responsibly and it is becoming an increasingly important communications tool.

The Trust currently uses social media as a tool to engage with the public, staff, media and other stakeholders to deliver positive, key messages for good healthcare and services. Staff are encouraged to follow, support and promote it.

Social media can be used to raise awareness of Trust activities, have a discussion or consult with patients and the public, pick up news items swiftly and be aware of any Trust issues circulating so that they can be addressed quickly.

4 Scope

The provisions and obligations of this policy apply to all Trust employees. They also apply to any other personnel working in but not employed by the Trust (including agency staff, contractors, volunteers and other workers undertaking work on Trust premises). This also applies, where appropriate, to patients and visitors.

5 Definitions

5.1 Social Media

Social media is the term commonly used for web-based and other mobile communication technologies that enable message and opinion to be shared in dialogue with others who often share the same community interests. Social media allows users to connect with each other, including sharing statements, photos, videos and live streams and can also be used to gather information, opinion or donations from members of the public. It may be accessed through an internet browser or an application (app). Popular platforms include, but are not confined to:

- Facebook
- Twitter
- Instagram
- Youtube
- Tik Tok
- LinkedIn
- Flickr
- WhatsApp
- Vimeo
- Google
- Personal blogging sites
- Self-Funding Websites such as gofundme

This list is not exhaustive. New social media platforms are constantly developing and sites are growing in popularity every day. It is important to note that other forums are also classed as social media platforms - such as blogs, Wikipedia, dating sites and opinion sites.

5.2 Personal Social Media sites

Personal social media sites are those sites that an individual uses to share information about their personal lives outside of work.

5.3 Professional/work related social media sites

Professional social media sites are those sites that individuals use to share information and network in relation to their profession or work related subjects.

5.4 Social networking

Social networking is the use of interactive web based sites or social media sites, allowing individuals on-line interactions that mimic some of the interactions between people with similar interests that occur in life. Popular examples include Facebook, Flickr and Instagram.

5.5 Blogging or Tweeting (micro-blogging)

Blogging or Tweeting (micro-blogging) is using a public website to write an on-line diary (known as a blog) or sharing thoughts and opinions on various subjects. Blogs and Tweets are usually maintained by an individual with regular entries of commentary, descriptions of events, and may include other material such as graphics or video. Many blogs and tweets are interactive allowing visitors to respond leaving comments or to potentially send messages to others. It is increasingly common for blogs to feature advertisements to financially benefit the blogger or to promote a blogger's favourite cause.

5.6 Personal/Portable/Electronic Devices

Personal devices (e.g. mobile phones/ smartphones/ personal laptops/ Ipads etc.) provide a means of communication and access to the internet. These may also include photograph or video cameras and satellite navigation or tracking facilities.

5.7 Copyright

All staff must at all times comply with the law in regard to copyright/plagiarism. Posting of someone else's work without permission is not allowed (other than short quotes that comply with the "fair use" exceptions). This includes the "lifting" (reusing content without permission) of images and videos from other sites, including that of the Trust and its partner organisations.

5.8 Defamation

Defamation is the act of making an unjustified statement about a person or organisation that is considered to harm their reputation. Defamation law can apply to any comments posted on the web, irrespective of whether they are made in a personal or professional capacity.

6. Policy Statement

The Trust recognises that many staff enjoy the benefits of using social media in a personal and professional capacity. Additionally many organisations, including The Shrewsbury and Telford Hospital NHS Trust (SaTH), use social media to share information and views and raise awareness.

The Communications team will provide guidance and training to empower staff to interact online in a way that is credible, consistent, transparent and relevant.

When an employee or worker is using social media, whether or not they have identified themselves as having an association with the Trust, they are expected to behave appropriately at all times and in a manner that is consistent with the Trust's values and policies, in addition to any professional codes of conduct applicable to the individual.

Employees who are found to breach this policy may be managed in line with the Trust's Disciplinary Policy. Relevant misconduct may constitute gross misconduct and may result in dismissal.

Employees are responsible for reading, understanding, and complying with the Terms of Service of the sites they use.

7 Duties

7.1 Trust Board

The Trust Board is responsible for implementing the standards of compliance specified in this policy within their areas of responsibility.

7.2 Managers

All Trust Managers are responsible for:

- Ensuring that staff within their team are aware, understand and have access to the Trust's social media policy.
- Taking appropriate action when they are aware of breaches of this policy in a timely, fair and appropriate way in accordance with the Trust's Disciplinary Policy.
- Ensuring that those associated with the Trust, who are not directly employed by the organisation, are aware that they should not share information about staff or patients or any other details that may bring SaTH into disrepute.
- Providing support to staff who find themselves the subject of cyber bullying, inappropriate postings or information sharing on online sites.
- Inform Human Resources and the Communications Team if they receive a complaint that this policy has been breached by a member of staff that they manage.

- Inform the Information Governance Team if it is considered that a breach of confidentiality may have occurred.

7.3 Employees

All members of staff are responsible for:

- Reading and adhering to the contents of this policy. It is up to individual members of staff to ensure they are fully conversant with this social media policy.
- Ensuring that they follow this policy in relation to their personal use of social media, both in a professional and personal capacity.
- Ensuring that no actual or potential information breaches occur as a direct result of their actions.
- Reporting actual or potential information breaches or communications that has the potential to damage the reputation of the Trust. Employees have a responsibility to report it immediately to their line manager, HR and the Communications Team.
- Reporting any incidents of cyber bullying that they are aware of in relation to colleagues or service users to their line manager.

7.4 Communications Team

The Communications Team is responsible for updating this policy.

The Communications Team will highlight breaches of the policy to an individual's line manager for them to take the relevant action. The Communications Team will support the Trust in investigating any potential breaches of this policy as required.

8 Social Media Conduct

8.1 Employee use of social media and social networking

Posts made through personal accounts that are public and can be seen, may breach the Trust's Social Media policy if they bring the organisation into disrepute. This includes situations when you could be identifiable as a Trust employee or as a member of your professional staff group (i.e doctor, nurse, allied health professional) whilst using social networking tools or occasions when you may be commenting on SaTH related matters in a public forum. Staff should also be aware of the requirements of their professional body in relation to the use of social media. The Nursing and Midwifery Council and the General Medical Council have national guidelines on the use of social media and staff are required to ensure they follow these guidelines (links to these documents can be found in section 8 of this policy).

Staff should use their own discretion and common sense when engaging in online communication. The following guidance gives some general rules and best practices which you should abide by at all times. Employees and workers, when using social media or any on-line communication, must not:

- Share any information that could breach patient or staff confidentiality. This is any content, including images, that contains patient information or any identifiable information about staff members within the workplace.
- Engage in any activities on the internet or share information which might bring the Trust into disrepute;
- Alter online sources of information on websites such as Wikipedia from a Trust perspective, unless directly permitted by the Communications Team;

- Post defamatory, derogatory, offensive, or abusive comments on the internet or social media about colleagues, patients, and/or volunteers and their work or the Trust;
- Use explicit language that might reasonably be expected to cause offence
- Post misleading or incomplete information that may influence the public to donate money or gifts to the Trust or to themselves.
- Employees should not post content that could be seen as disrespectful in relation to the care we give, or interpreted in such a way by patients, patients loved ones or fellow staff members.
- Post information relating to work related grievances or any Trust management processes such as disciplinary, sickness absence or performance issues; and
- Share photos or images of patients or carers, even if requested to do so, unless this forms part of an ongoing Communications-approved campaign for which you have authority to work on. In which case, please contact the Trust Communications Team to provide authorisation.

If an employee, worker or volunteer receive media interest following any social media post then they should be directed to the Trust's communications team to seek further advice.

Individuals who identify themselves as being connected to SaTH must not use social media to disclose information that is confidential, illegal, immoral or brings the organisation into disrepute or results in any adverse publicity. Staff should refer to the Trust's Information Governance Policy regarding information sharing.

Any employee writing a personal blog should adhere to the guidance given in this policy if the blog touches on any work related matters.

Staff should be aware of their association with SaTH when using online social networks. They must ensure that their profile and related content is consistent with how they would wish to present themselves with colleagues, patients and carers.

Staff should be aware that even if they have secure privacy settings on their personal account that if they are members of a group, all the other members will have the ability to see and use contact details.

Staff are personally responsible for the content they publish on blogs, wikis or any other form of user-generated media, and should use the same principles and standards online that you would apply to communicating in other media with people they do not know.

Staff who hold a professional registration must comply with the relevant requirements of their professional body in relation to the use of social media. SaTH will report relevant misconduct in line with its Disciplinary Policy.

8.2 Use of Social Media in Work

Employees are only permitted to use social media websites in work time if it is of benefit to your role/the department within SaTH and with your line manager's consent. If you have any concerns, please seek clarification with your line manager. Staff should be aware that, in the relevant investigative circumstances, the IT Team have the ability to monitor an individual's use of social media websites.

8.3 Access to social networking sites for personal use

Social Media websites are accessible from SaTH workstations and devices. Employees should only access social networking sites for personal use during non-working time e.g. before commencing work, during breaks or after work.

8.4 References and endorsements

For social networking sites such as LinkedIn where personal and professional references are the focus, if an employee is representing themselves as a SaTH employee, they may not provide professional references about any current or former employee, contractor, vendor or contingent worker.

An employee may provide a personal reference or recommendation for current or former employees, contractors, vendors and contingent workers provided:

- the statements made and information provided in the reference are factually accurate; and
- they include the disclaimer below:

“This reference is being made by me in a personal capacity. It is not intended and should not be construed as a reference from The Shrewsbury and Telford Hospital NHS Trust.”

If an individual requires a professional reference please refer them the SaTH Recruitment Department.

8.5 Raising Concerns

The Trust's Freedom to Speak Up: Raising Concerns (Whistleblowing) Policy states the routes of communication to raise a concern and no member of staff will use social media or networking to undertake whistleblowing.

Please refer to the Trust's Freedom to Speak Up: Raising Concerns (Whistleblowing) Policy for more information.

8.6 Reporting inappropriate behaviour on Social Media

If a member of staff witnesses information contained on social media sites that contravenes this policy, including closed social media sites such as (but not limited to) WhatsApp or closed Facebook groups, they should report the issue through their line manager, Human Resources and the Communications Team.

All incidents will be investigated by the appropriate Care Group with support provided by Workforce Directorate, Medical or Nursing Director if it breaches GMC or NMC guidelines, and where necessary the Information Governance Team.

8.7 Responding to the media

The Trust does not encourage staff to engage in “unofficial”, spontaneous exchanges in response to published media comment on behalf of the Trust. Any employee requiring advice on responding through approved channels should contact the Communications Team for advice.

All enquiries from the media should be directed to the Communications Team, employees should not respond to media enquiries on behalf of the Trust.

8.8 Trust use of social media and social networking

The Communications Team must be consulted before any social media is used on behalf of the Trust.

As a Trust, we actively share information and manage official Trust accounts on Facebook, Twitter, Instagram, YouTube and LinkedIn. We use these accounts to raise awareness and promote the work of the organisation as well as to share important messages with staff and our wider local community.

As a Trust, we use social media during a crisis in order to help spread key messages and updates. This could be anything that affects the service(s) at our hospitals in which the public, staff and patients may need quick-paced updates. We will provide the latest information through social media during times of crisis and encourage members of staff to engage with and share these messages to help increase the reach of the posts.

The Trust manages its social media accounts within the parameters outlined in this policy, we ask that staff engage positively with SaTH through these accounts.

9 Resources and Further Guidance

If you would like further support, advice or guidance regarding your use of social media then please email sath.commsteam@nhs.net for more information.

Often, social media platforms offer “quick guides” to privacy on their sites. There are also a number of useful resources on the NHS Employers site for privacy checking and general guidance.

If you are in any doubt about how to use social media, in a professional capacity or a member of staff at the Trust, please speak to your line manager or email sath.commsteam@nhs.net

Professional Guidelines on the use of social media from the NMC and GMC can be found on the links below:

NMC: <https://www.nmc.org.uk/globalassets/sitedocuments/nmc-publications/social-media-guidance.pdf>

GMC: <https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/doctors-use-of-social-media>

10 Training Needs

Advice on compliance with this policy will be provided by the Communications Team.

11 Review process

The policy will be reviewed every three years. In order that this document remains current, any of the appendices to Social Media Use Policy can be amended and approved during the lifetime of the document without the document strategy having to return to the ratifying committee.

12 Equality Impact Assessment (EQIA)

This policy applies to all employees equally and does not discriminate positively or negatively between protected characteristics.

13 Process for monitoring compliance

The Trust reserves the right to use legitimate means to scan the web, including social media sites for content that it finds inappropriate.

Social Media Use Policy

A formal review of this policy will be conducted every three years or following a change to associated legislation and/or national guidance or national/local terms and conditions of service. The policy will also be reviewed by the Communications Team on a regular basis to ensure that the policy remain up to date and relevant.

The responsibility for this policy and staff guidance is delegated to the Chief Communications Officer.

Aspect of compliance or effectiveness being monitored	Monitoring method	Responsibility for monitoring (job title)	Frequency of monitoring	Group or Committee that will review the findings and monitor completion of any resulting action plan
<i>Policy</i>	<i>Review of Policy when Trust circumstances change or technology develops</i>	<i>Chief Communications Officer</i>	<i>On Policy Review</i>	<i>Communications Team</i>
<i>Staff adherence to policy</i>	<i>Review of any flagged content and relevant line manager informed of breaches</i>	<i>Digital Communications Team</i>	<i>Continuous</i>	<i>Communications Team</i>