Trust social media policy

Version 3.0

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Document History

Title

Version	Issue	Reason for change	Authorising body	Date
1	0	**New Policy**	**Trust Management Committee**	**April 2014**
2	0	**Updated policy to reflect communications strategy (published September 2017) and changing social media channels and trends**	**Trust Management Committee**	**February 2018**
3	0	**Updated Policy**	**Executive Management Committee**	

Associated documents

BHT Ref	Title	Location/Link
BHT Pol 129	Media Policy	http://swanlive/policies-guidelines/corporate
	Communications and Engagement Strategy	On request from the Communications Department
	Local plan – Major incident communications plan	On request from the Communications Department http://swanlive/policies-guidelines/business-continuity-plans
	Local plan – Web development guide	On request from the Communications Department
	Emergency plan, available at	http://swanlive/policies-guidelines/business-continuity-plans
BHT Pol 051	Information Governance Policy	http://swanlive/policies-guidelines/ig-policies-and-strategies
BHT Pol 199	Information Governance Confidentiality Code of Conduct	http://swanlive/policies-guidelines/ig-policies-and-strategies
BHT Pol 092	Raising Concerns Policy and Procedures	http://swanlive/policies-guidelines/staff-policies

BHT Pol 032	Discipline Policy and Procedures	http://swanlive/policies-guidelines/staff-policies
BHT Pol 019	Declaration of Interest Policy	http://swanlive/policies-guidelines/code-conduct
BHT Pol 056	IT Internet Access Policy	http://swanlive/policies-guidelines/information-technology
BHT Pol 203	VIP policy	http://swanlive/policies-guidelines/corporate
BHT Pol 031	Dignity and respect at work policy	http://swanlive/policies-guidelines/staff-policies
BHT Pol 206	Professional and personal boundaries policy	http://swanlive/policies-guidelines/staff-policies
BHT Pol 229	Policy for the Photography of Patients by Non-Medical Photography Department Staff	http://swanlive/sites/default/files/bht_pol_229_v2_0_-_photo_policy_v2.0_rvw_06_2023_0.pdf
IG0114	Guidance for staff in the event of patients recording interactions with staff	http://swanlive/policies-guidelines/staff-policies

Contents

Appendices

1. Introduction and purpose

1.1. The policy has been created to:
- Protect the confidentiality of our team members and patients
- Provide guidance to Buckinghamshire Healthcare NHS Trust (BHT) team members and volunteers on using social media
- Ensure team members behave in a way which is consistent with the values of the Trust
- Protect the professional boundaries between team members and service users
- Protect the reputation of the Trust.

1.2. Please be reminded that you should raise concerns regarding the use of social media with your line manager in the first instance.
- If you have general concerns your manager is unable to assist with please contact the Communications Team on bht.communications@nhs.net
- For specific concerns you should also refer to the following guidance:
  - Please refer to 'Guidance for staff in the event of patients recording interactions with staff - IG0114'
  - You can also find more information on patients recording NHS staff in health and social care settings here.
  - Please refer to the advice from the BMA about patients recording consultations here.
  - Please refer to the Policy for the Photography of Patients by Non-Medical Photography Department Staff for more information on protecting the confidentiality of our patients.

1.3. The definition of social media is websites and applications that enable users to create and share content, or to participate in social networking. Social media is different to the more traditional forms of media (such as print newspapers, TV or radio) because of its potential to reach many groups or individuals, its frequency, immediacy and permanence.

1.4. Social media can provide additional and powerful options as part of the wider communication mix of tools and methods available to the Trust, and is a relatively low-cost option. It has proved to be particularly useful for organisations in times of change and challenge. For example:
- to share and celebrate good news and achievements
- when strategies or programmes are being formulated
- when service or organisational change is required
- whenever changes in attitudes, perspectives or behaviours are required, for example, new ways of working, using local services more intelligently, only going to A&E if it is an emergency, getting a flu vaccination at the pharmacist etc.
- to provide a two-way communication channel to improve engagement between team members.

1.5. Part of the Trust's communications and engagement strategy is to make better use of social media channels to support team members, engage with patients and other stakeholders and to share our news and content.

This updated policy aims to provide a framework through which the Trust can harness the opportunities provided by social media and ensure that all Trust employees use social media legitimately, appropriately, safely and responsibly.

1.6.   At BHT the communications team use our verified Trust Facebook, Twitter and YouTube accounts to share Trust news with service users, the local and wider communities, stakeholders, other NHS Trusts and services, and the press. Our followers know that we share content that they can trust. The information we share via social media is rigorously checked to ensure that it is for public consumption.

1.7.   We are aware that many team members have social media profiles and like to engage with the Trust social media accounts and their colleagues'. We want everyone to do so safely so that the Trust is not brought into disrepute, and so that the security and identity of colleagues and service users are protected at all times, in every post and comment. Please see Appendix A for social media guidelines to use social media safely and effectively.

1.8.   At BHT we use social media platforms and applications for team member communications, such as the closed, team member only Facebook group, BHT Team Buzz and the Our BHT app. Here we share information for internal purposes only, to benefit team members and share information that should not exist in the public domain. BHT Team Buzz in particular is the safe space team members can use to share successes, ideas for improvement, ask for support, support each other and join discussions.

1.9.   Social media develops rapidly with almost constant innovation. It includes forums, blogs and microblogs, social networks, professional networks, video content sharing and instant messaging. Social media exchanges take place on standalone channels specifically designed for social media through to more traditional media incorporating social media, for example, via comments functions on websites to community forums that can wield influential power such as Mumsnet.

Any message, post, opinion or comment made on any form of social media can be shared and picked up across all platforms and channels.

Examples of social media channels include, but are not limited to:
- Facebook
- WhatsApp
- Messenger
- Tumblr
- Instagram
- Pinterest
- LinkedIn
- Snapchat
- Twitter
- YouTube
- Vimeo
- TikTok

1.10.   The policy applies to all BHT team members employed by the Trust and volunteers. Any queries or questions should be raised with a member of the communications team (see section 11).

1.11.   Failure to adhere to this policy may result in disciplinary action.

## 2.	Terminology/definitions

Term	Meaning/Application
Social media	Online activity where a user creates, shares or exchanges information and/or expresses opinion. This includes, but is not exclusive to, forums, blogs/microblogs, social and professional networking, photo and video sharing sites. This includes Facebook, WhatsApp, Messenger, Tumblr, Instagram, Pinterest, LinkedIn, Snapchat, Twitter, YouTube, Vimeo and TikTok.
Team members/colleagues	For the purposes of this policy the terms "team members" and "colleagues" refers to anyone carrying out business at the Trust whether paid or unpaid.

## 3.	Legislation and guidance

3.1.	The Trust has a legal obligation to comply with all appropriate legislation in respect of data, information and security. It also has a duty to comply with guidance issued by the Department of Health and Social Services, advisory groups to the NHS and guidance issued by professional bodies.

3.2.	The legislation listed below refers to issues of security and/or confidentiality of personal identifiable information/data. This list should not be considered exhaustive:
   • **The Data Protection Act, 2018**. For example, it is important that any content including photos published on social media sites, does not inadvertently reveal data which would be in breach of this Act.
   • **Freedom of Information Act, 2000**. This gives anyone the right to access recorded information held by public sector organisations in a formal and recorded way.
   • Confidentiality: **NHS Code of Practice, 2003**. This code of practice sets out standards to ensure that patient information is handled fairly, lawfully and as transparently as possible. For example, do not share or display personal or private information via social media knowingly or inadvertently without appropriate consent (see section 6, paragraphs 6.7 and 6.8).
   • **The Human Rights Act 1998**: Article 8 gives a 'right to respect for private and family life, home and correspondence'. Individuals should not be named or included in social media posts/photos without consent (see section 6, paragraphs 6.7, 6.8, 6.12 and 6.13).
   • **General Data Protection Regulations (GDPR) 2018**. GDPR affects information that can be used to directly or indirectly identify someone - including social media posts, a name or a photo. The person concerned has a right to know what data is held and also has the right to be 'forgotten' - i.e. have this data erased to stop further dissemination. For example, this could include withdrawal of consent previously granted to use a photo of them in a social media post.

3.3.	**Professional codes of conduct**:
   Any team members with professional registration and regulation have a duty to uphold the reputation of their profession at all times, and inappropriate conduct online could jeopardise registration if their fitness to practice is called into question.

Team members represented by professional bodies should also be aware of any guidance set by the body regarding use of social media, this includes:

- **NMC (Nursing and Midwifery Council)**: click here for more information. Nurses and midwives may put their registration at risk, and students may jeopardise their ability to join the NMC register, if they act in any way that is unprofessional or unlawful on social media.
- **BMA (British Medical Association)**: click here for more information. This guidance provides practical and ethical advice on the different issues that doctors and medical students may encounter when using social media.
- **GMC (General Medical Council)**: click here for more information.
- **HCPC (Health and care professions council)**: click here for more information.

The list above should not be considered exhaustive.

3.4. The implementation of this policy is supported by other procedures, local plans and related policies. These are listed in the Associated Documents Table on pages 2-3.

4. Roles and responsibilities

4.1 Managers are responsible for ensuring their team members are aware of this policy and that it is implemented in their areas. Managers are also responsible for taking appropriate action if the policy has not been adhered to.

4.2 Team members are responsible for complying with this policy and behaving in an appropriate way in their social media usage.

4.3 The communications team is responsible for developing, delivering and monitoring BHT's own social media channels.

5. General standards for social media usage

Team members using social media (for personal and corporate use) must not:

5.1 Breach data protection laws or patient confidentiality - patient identifiable information should not be visible in any photo or video content. This could be names, initials, photographs or date of birth information visible in the background of photos shared – always check the whole photograph.

    5.1.1 No information relating to patients should be shared via social media without consent from the patients, carers or visitors concerned.

5.2 Publish images or text that might be considered as harassment or are discriminatory, offensive or abusive. This includes the promotion of discrimination based on factors such as race, sex, religion, nationality, disability, sexual orientation or age. If you are not sure if the photograph or post you would like to publish or share is appropriate please contact the communications team in the first instance: bht.communications@nhs.net.

5.3 Publish images or text that might be considered threatening, abusive, hateful or inflammatory, which constitute an invasion of privacy, or causes annoyance, inconvenience or needless anxiety or which promote violence.

5.4 Publish or share anything that may be considered discriminatory against, libellous or bullying and/or harassment of, any individual. Derogatory comments made about other team members will be classed as bullying and harassment, even if done outside of work hours and off work premises. Team members should refer to the Dignity and Respect at Work policy (BHT Pol 031) for more information.

5.5 Infringe any copyright, database right or trademark of any other person or organisation including posting copyrighted information in a way that violates the copyright of that information.

5.6 Publish or share images or text that advocate, promote or assist in any unlawful act or any illegal activity.

5.7 Introduce or promote the use of any form of computer virus or malware.

5.8 Deliberately impersonate any person or misrepresent your identity or affiliation with any person in a way that would bring the reputation of the Trust into disrepute.

5.9 Breach the terms of service of the social network.

5.10 Promote messages or support online campaigns from organisations whose association, individual and by implication, could bring the Trust into disrepute. Remember that liking, sharing or retweeting messages can be interpreted as support and agreement with the message itself or the organisation/campaign that it is associated with.

5.11 Use your position at the Trust to promote personal financial interests or commercial ventures to secure personal advantage.

5.12 Provide links to websites of a violent, obscene or offensive nature or which contain any content that can be construed as violating any of the above guidelines.

5.13 Make any discriminatory, disparaging, defamatory or harassing comments or otherwise engaging in any conduct prohibited by BHT's policies. This includes indirect posting i.e.: 'liking' or 'sharing' another social media user's negative comments or inappropriate posts, team members should refer to the Discipline Policy and Procedure for more information.

5.14 Make or share slanderous, defamatory, false, obscene, indecent, lewd, pornographic, violent, abusive, insulting, threatening or harassing images or comments.

6. Trust specific standards for social media usage

Team members using social media (for personal and corporate use) must:

6.1 Refrain from any action which brings them, their colleagues, the Trust or the NHS into disrepute either intentionally or unintentionally. Team members must behave at all times in a way that is consistent with the values of the Trust and the reputation of their profession both online and offline.

6.2 Not purport to represent the views of the Trust unless with prior consent from the communications team.

6.3 Not use social media anonymously or set up an account under a pseudonym. Doing so can lead to miscommunication to followers, affect the reliability of the verified Trust social media accounts and breach the terms and conditions of the social media platform used.

For more information on Facebook guidelines regarding names click here. Please note that due to features on many devices and social media platforms, those that choose to do use social media anonymously or set up an account under a pseudonym could be identified.

6.4 Raise workplace concerns or issues with their line manager or the Freedom to Speak Up Guardian in the first instance. Please do not use social media to raise an issue of concern in the workplace. There are mechanisms in place for team members to speak out safely, please refer to the Trust's Raising Concerns policy.

6.5 Not set up any social media account using the Trust name or branding without seeking permission and advice from the communications team. Remember that setting up a Facebook group for your service, or a Twitter account to share your team's professional achievement may seem necessary; but effective and engaging social media accounts require consistent content, a strong admin team and consideration for your target audience. The communications team will be able to support you with sharing your valuable content in the most effective and engaging way to more than 10,000 followers via the Trust social media accounts.

6.6 Maintain professional boundaries online with service users. Please refer to the Trust Professional and Personal Boundaries policy [BHT Pol 206].

6.7 Adhere to Trust policies, all Trust policies apply when using social media. If you have any concerns about confidentiality or a potential conflict of interest, please contact the communications team on 01494 734959 or email bht.communications@nhs.net.

6.8 Ensure that every effort is made to ensure that their personal social media profiles are secure: do not share your passwords and ensure that you are comfortable with what others can see publicly, such as your profile and cover photographs, photographs that you are tagged in and groups/page you support. Please ensure that all photographs that are publicly visible are appropriate and comply with professional and Trust standards, especially if you identify yourself as a Trust employee on your social media profile.

6.9 Not take photos or film in clinical areas without permission from a senior leader and the consent of all parties involved.

6.10 Not photograph or film the inappropriate use of clinical equipment or PPE.

7. Accessing social media accounts while at work

When accessing social media, including personal accounts for personal use on BHT IT systems, the following principles **shall** be followed by team members:

7.1 Excessive personal use of social media during working hours is forbidden and contraventions to this may lead to disciplinary action. Please restrict personal use of social media to break times.

7.2 Keep any NHS or other UK Government information shared with you that is not in the public domain confidential. Do not use social media to share or store any confidential information.

7.3 Social media shall be used in a manner that does not bring BHT or the wider NHS into disrepute or harm, or tarnish its image or reputation through offensive, inappropriate or derogatory remarks.

8.   Participation in professional debates and promotions

8.1   We recognise the importance of team members joining in with industry/profession discussions. Team members can contribute to reputable discussion forums, networks and/or blogs associated with their profession.

8.2   These discussions should be for the benefit of the Trust and add to the 'industry conversation'.

8.3   Team members must behave respectfully and clearly state that views are of a personal nature.

8.4   Any comments posted on a social media account must be factual and verifiable.

9.   Seeking social media coverage via corporate channels

The Trust has established its own verified presence on social media sites including Facebook, Twitter and YouTube (@buckshealthcare), and team members are asked to contact the communications team if they wish to use these channels for promotional purposes.

The team is available between 9am and 5pm every working weekday, they can be contacted on 01494 734959 or via email: bht.communications@nhs.net

The communications team is also available via mobile through the switchboard.

10.   Setting up and running service or department social media accounts

10.1   As part of its communications and engagement strategy, the Trust actively supports the use of social media communication where the potential benefit for service users, professional networking, or for service promotion can be identified. The communications team is keen to support departments or services with an identifiable audience, a strong understanding of the benefits of social media, and the skills and commitment to maximise those benefits. This includes accounts representing a specific service or department including clinical areas and closed groups set up for patients/service users. Any social media accounts established by or set up to represent a service, department or group within the Trust must seek approval from the communications team in advance.

10.2   All proposed corporate social media accounts must complete the application for new accounts fully (see Appendix C) before they can be passed for approval by the Associate Director of Communications and Engagement.

10.3   A member of the communications team must be set up with administrator rights on any approved service or department social media accounts.

10.4   Moderators and administrators for any such accounts must read and adhere to the requirements of the social media policy.

10.5   The communications team must be informed if any moderators/administrators of the service/department social media account leave the Trust. Moderation/admin rights must be removed from these individuals and the communications team must be informed of who in the service or department will be assuming the ongoing responsibility for the account.

10.6   Team members must not use the Trust logo or the NHS lozenge without prior consent from the communications team.

11.   Social media and the media

If team members are contacted by the media via their personal social media accounts regarding any comment they have made, they must contact the communications team before responding on 01494 734959 (or contact the on call communications representative via Switchboard for out of hours queries) or email BHT.communications@nhs.net.

12.   Breaches of policy

12.1   Team members who become aware of a breach of this policy are asked to raise the issue with their line manager in the first instance.

12.2   Line managers should seek to resolve the issue informally before escalating to Human Resources for further support if required.

12.3   If the breach in policy could affect the reputation of the Trust the communications team must be informed.

13.   Proposed dissemination

13.1   This policy document is available on the Trust intranet and will be circulated via the daily bulletin, BHT Today.

13.2   Advice on this policy is available from the communications team on 01494 734959 or email bht.communications@nhs.net

14.   How compliance will be monitored

14.1   The communications team manages and monitors corporate social media channels. However, it is every individual's responsibility to report any behaviour which breaches this policy.

14.2   The communications team also monitors all social media activity for any mentions of the Trust, Trust services, team members, or for topic trends that may relate to the organisation.

14.3   Service or department social media accounts will be monitored by the named individuals within the team/service. Such accounts will also be regularly monitored by the communications team. Any breaches in standards or moderation controls will result in the account being closed down by the communications team.

14.4   It is every individual's responsibility to monitor their personal social media accounts and to report any behaviour which breaches this policy.

14.5   Any breaches in standards for social media use as set out in sections 5, 6, 7 and 8 of this policy that are brought to the attention of the Trust will be handled via usual disciplinary procedures.

15. Non-compliance with this policy

15.1   The Trust will apply the same standards of conduct in online matters as it would in offline issues.

15.2   Managers should consider the nature of any comments made and their likely impact on the organisation and on other team members in terms of bullying and defamation.

- Bullying/harassment: unwanted conduct that has the purpose or effect of violating a person's dignity or creating an offensive, intimidating or hostile environment.

- Defamation: comments or actions that can be damaging to someone's or an organisation's reputation.

16. Monitoring the policy

Minimum requirement to be monitored	Process for monitoring e.g. audit	Responsible Individuals to undertake monitoring and production of a report.	Frequency of monitoring / audit	Responsible individuals receiving the monitoring report and for development of action plan.	Responsible committee for review of action plan	Responsible committee for Monitoring of action and audit to ensure satisfactory conclusions.
Staff Compliance with policy	Monitoring Trust Social Media channels & review of any related complaints received	Comms team	Monitoring ongoing, reporting by exception	Associate Director of Communications	EMC	EMC

APPENDIX A

General guidelines

- Always apply common sense.

- Be respectful, appropriate and professional at all times.

- Choose your method of communication wisely: ask for support, ideas for improvement and share advice in BHT Team Buzz.

    o Always think before posting something to social media: if you wouldn't wish your comments to be attributed to you in public then don't share them online, even if enhanced privacy settings have been applied to your login/profile – once something has been published to the internet it can no longer be considered to be private, as others can take a screen grab and share to a wide, uncontrolled, potentially global audience.

    o Always think about the consequences of what you say on social media, an online comment, such as a tweet, is potentially libellous in England and Wales if it damages someone's reputation "in the estimation of right-thinking members of society". It can do this by exposing them to "hatred, ridicule or contempt".

        ▪ Even if you delete a defamatory post you can still be subject to disciplinary procedures or can still be sued. Just because you have deleted it, that does not mean others have not already reposted it. Once it is out there, you cannot take it back.

    o Consider if/how you can be identified on social media channels as an employee either explicitly (i.e. in personal information or profile) or implicitly (i.e. photographed in Trust uniform). Also consider and be aware of the connections that can be made across different social media platforms and how personal details that you may wish to remain private, such as photos, may become publicly accessible. Please follow guidance on privacy settings provided by all social media platforms. Please take into account your personal security and professional reputation as well as the reputation of the Trust.

- Make sure your profile and cover pictures are appropriate.

- Do not share your account or your passwords with anyone.

- Celebrate your successes.

- If a team member likes, shares or retweets your post, do not mistake that for agreement or permission regarding the content of your post.

APPENDIX B

Checklist for new account applications

- ☐ Read the BHT social media policy
- ☐ Read Facebook guidelines (if applicable)
- ☐ Complete the social media account application
- ☐ Await application approval

Following application approval, the following steps must be taken for any new Facebook sub sites and closed Facebook groups

- ☐ Create leadership team – identify admins/moderators
- ☐ Determine and select appropriate privacy settings
- ☐ Write a page introduction/bio/about information (to be approved by the communications team)
- ☐ Ask communications team for Facebook rules/governance document
- ☐ Assign site name/handle
- ☐ Create page
- ☐ Set up moderators/admins – including named communications representative
- ☐ Decide on pre-approvals
- ☐ Decide upon membership questions which will allow members to be granted access to the closed Facebook group
- ☐ Prepare files to upload by admin and agree on which files to allow
- ☐ Assign team members to engage with the workforce team to ensure leavers are removed from the group.

APPENDIX C

Application form for service or department level social media accounts

As a communications team we are responsible for protecting the reputation of the Trust. We are keen to make sure any use of social media is within our Trust policy. Please complete the below form once you have read the social media policy:

1. **Please indicate which type of social media channel you wish to set up [e.g. Twitter, Facebook etc.]:**

2. **Please outline who the content of the social media posts/tweets is aimed at [i.e. your audience]:**

3. **Aims/objectives of the account/page/group: [Why you wish to set it up, what you hope to achieve, your vision]**

4. **Please provide details for this social media account:**

   Account name:

   Administrators:

   Moderator:

5. **Is the account for social or professional purposes?**

6. **If social purposes only, can you ensure that there are no identifiable elements that may be picked up by search engines or by anyone viewing content?**

6.1. **Will you ensure that all members who join your group will be directed to the group rules and asked to adhere to them?**

7. **If for professional purposes, will you ensure that all members are instructed to read the Trust social media policy and your group rules, and adhere to those rules?**

8. **Please provide details on how the account will support Trust strategic aims and CARE values**

9. **How will it benefit BHT team members?**

10. **How will it benefit patients/communities?**

11. **What logo or profile pictures will be used and what image will be used for the page header/cover photo? [*NB Communications team approval must be sought before publishing page header images*].**

12. **How do you intend to manage and moderate this account? [*i.e.: your strategy for dealing with any negative posts or comments, and how you intend to avoid any potential breaches of Trust or professional body social media policies*]**

Thanks for your co-operation, please send this form to bht.communications@nhs.net and the communications team will consider your request and respond as quickly as possible.

APPENDIX D

BHT Team Buzz Rules

Buzz safely and securely

Secure your profile so that you are comfortable with what is visible to the public, and therefore BHT Team Buzz members. Remember to never share your Facebook password with anyone.

Follow the CARE values

Collaborate, Aspire, Respect and Enable!

Make room for the good stuff

Give more to this group than you take. Please don't share spam, irrelevant links or promote any multi-level marketing ventures that you're involved in such as FM, Herbalife etc. via the group or private messages.

No hate speech or bullying

Bullying of any kind isn't allowed, and degrading comments about things such as race, religion, culture, sexual orientation, gender or identity will not be tolerated.

Respect everyone's privacy

Being part of this group requires mutual trust. What's shared in the group should stay in the group. This is also not a space to discuss patients, or any confidential information that is not in the public domain.

No political campaigning

Respect everyone's boundaries

Don't send private messages to any group member that includes content that you would not share in a post to the entire group. Don't expect people to accept friend requests.

No harassment or trolling - be kind and polite

We're all in this together to create a welcoming environment. Let's treat everyone with respect. Healthy debates are natural, but kindness is required.

Contact an admin with any group concerns you have