Trust social media policy

Version 2.0

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Document History

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**
2	0	**Updated Policy**	**Executive Management Committee**	

Associated documents

BHT Ref	Title	Location/Link
BHT Pol 129	**Media Policy**	http://swanlive/sites/default/files/bht_pol_129_-_trust_media_policy_v4.0_rvw_06_2019.pdf
	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/emergency-planning-business-continuity
	Local plan – Web development guide	On request from the Communications Department
	Emergency plan, available at	http://swanlive/policies-guidelines/emergency-planning-business-continuity
BHT Pol 051	Information Governance Policy	http://swanlive/sites/default/files/bht_pol_051_-_information_governance_policy_including_imt_security_ig0005_5.0_rvw_05_2019.pdf
BHT Pol 199	Information Governance Confidentiality Code of Conduct	http://swanlive/sites/default/files/bht_pol_199_information_governance_confidentiality_code_of_practice_v6.0.pdf
BHT Pol 092	Raising Concerns Policy and Procedures	http://swanlive/sites/default/files/bht_pol_092_-_raising_concerns_policy_and_procedure_v3.0_rvw_07_2020.pdf

BHT Pol 032	Discipline Policy and Procedures	http://swanlive/sites/default/files/bht_pol_032_-_disciplinary_policy_procedure_v4_0_rvw_11_2018_final.pdf
BHT Pol 019	Code of Business Conduct for Trust Staff & Members of the Board Policy	http://swanlive/sites/default/files/bht_pol_019_v7.1_rvw_09_2018_0.pdf
BHT Pol 056	IT Internet Access Policy	http://swanlive/sites/default/files/bht_pol_056_it_internet_access_policy_v4.0_rvw_12_2019.pdf
BHT Pol 203	VIP policy	http://swanlive/sites/default/files/bht_pol_203_-_approved_visitor_policy_v1.2_rvw_11_2018.pdf
BHT Pol 031	Dignity and respect at work policy	http://swanlive/sites/default/files/bht_pol_031_-_dignity_and_respect_at_work_policy_procedure_v4.0_rvw_06_2020.pdf
BHT Pol 206	Professional and personal boundaries policy	http://swanlive/sites/default/files/bht_pol_206_-_personal_and_professional_boundary_policy_v1.1_rvw_03_2018.pdf

Contents

1 Introduction and purpose

1.1. The definition of social media is websites and applications that allow 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.

1.2. 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; or
- whenever changes in attitudes, perspectives or behaviours are required- (new ways of working, using local services more intelligently, only going to A&E if it's an emergency, getting a flu vaccination at the pharmacist)

1.3. 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

1.4. Buckinghamshire Healthcare NHS Trust recognises the increase in social media usage and its potential benefits to the organisation. Part of the Trust's communications and engagement strategy is to make better use of social media channels to support staff, 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.

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

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

2. Principles

2.1.   The policy has been created to:
   •   Protect the confidentiality of our staff and patients
   •   Provide guidance to employees and volunteers on the acceptable use of social media within the Trust
   •   Ensure staff behave in a way which is consistent with the values of the Trust
   •   Protect the professional boundaries between staff and service users
   •   Protect the reputation of the Trust

3. 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.
Staff / employees	For the purposes of this policy the terms "staff" and "employees" refers to anyone carrying out business at the Trust whether paid or unpaid.

4. Legislation and guidance

4.1.   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.

4.2.   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, 1998. 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 7, paragraphs 1.5, 1.6 and 1.8).

- 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 7, paragraphs 1.5, 1.6 and 1.8).
- General Data Protection Regulations (GDPR) May 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 (see section 7, paragraphs 1.5, 1.6 and 1.8).

4.3.   Professional codes of conduct:
Any staff 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. Staff 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): www.nmc.org.uk/globalassets/sitedocuments/nmc-publications/social-media-guidance.pdf 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): www.medschools.ac.uk/SiteCollectionDocuments/social_media_guidance_may2011.pdf   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): www.gmc-uk.org/Doctors__use_of_social_media.pdf_51448306.pdf
- HCPC (Health and care professions council): www.hpc-uk.org/assets/documents/10005190Guidanceonsocialmedia-draftforconsultation.pdf

The list above should not be considered exhaustive.

4.4.   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.

5. Roles and responsibilities

5.1.   Managers are responsible for ensuring employees 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.

5.2. Employees are responsible for complying with this policy and behaving in an appropriate way in their social media usage.

5.3. The communications department is responsible for developing, delivering and monitoring Buckinghamshire Healthcare NHS Trust's own social media channels.

6. Standards for social media usage - general

6.1. Staff using social media (for personal and corporate use) are forbidden from:

6.1.1. Breaching data protection laws or patient confidentiality.

6.1.2. Publishing 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.

6.1.3. Publishing 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.

6.1.4. Doing anything that may be considered discriminatory against, libellous or bullying and/or harassment of, any individual. Derogatory comments made about other employees will be classed as bullying and harassment, even if done outside of work hours and off work premises. Staff should refer to the dignity and respect at work policy (BHT Pol 031) for more information.

6.1.5. Infringing any copyright, database right or trade mark of any other person or organisation including posting copyrighted information in a way that violates the copyright of that information.

6.1.6. Publishing images or text that advocate, promote or assist in any unlawful act or any illegal activity.

6.1.7. Introducing or promoting the use of any form of computer virus or malware.

6.1.8. Deliberately impersonating any person, or misrepresenting your identity or affiliation with any person.

6.1.9. Breaching the terms of service of the social network.

6.1.10. Promoting messages or supporting online campaigns from organisations whose association, individual and by implication, could bring the Trust into disrepute.

6.1.11. Promoting personal financial interests or commercial ventures to secure personal advantage.

6.1.12. Providing 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.

6.1.13. Making any discriminatory, disparaging, defamatory or harassing comments or otherwise engaging in any conduct prohibited by the Buckinghamshire Healthcare NHS Trust's policies. This includes indirect posting (ie: "liking" another social media user's negative comments or inappropriate post), staff should refer to the Discipline Policy and Procedure for more information.

6.1.14. Making or sharing slanderous, defamatory, false, obscene, indecent, lewd, pornographic, violent, abusive, insulting, threatening or harassing images or comments.

7. Standards for social media usage – Trust specific requirements

7.1. Employees using social media (for personal and corporate use) must:

7.1.1. Refrain from any action which brings them, their colleagues, the Trust or the NHS into disrepute either intentionally or unintentionally. Staff must behave at all times in a way that is consistent with the values of the Trust and the reputation of their profession both on- and off-line.

7.1.2. Not purport to represent the views of the Trust unless with prior written consent from the communications department.

7.1.3. Not use social media anonymously. Posting under a pseudonym or anonymously can attract unwanted followers and social media users could still identify employees if they use different social media channels and have similar user names or they link between the two.

7.1.4. Not use social media to raise an issue of concern in the workplace. There are mechanisms in place for staff to speak out safely and we would encourage them to raise concerns as per the Trust's Raising Concerns policy.

7.1.5. Not identify any patients, carers or visitors in any comments, posts or uploaded content without prior consent from the communications department and without written consent from the patients, carers or visitors concerned.

7.1.6. Not discuss patients; even if they are not referred to by name, staff must in no way breach patient confidentially. No information relating to patients should be shared via social media without prior written consent from the patients, carers or visitors concerned and without prior consent from the communications department.

7.1.7. Not conduct personal relationships online with service users that could be considered a breach of professional boundaries or result in inequitable delivery of care. Please refer to the Trust Professional and Personal Boundaries policy [BHT Pol 206]

7.1.8. 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 department on 01494 734959.

8. Standards for social media usage – accessing social media accounts while at work

8.1. When accessing social media, including personal accounts for personal use on Buckinghamshire Healthcare NHS Trust IT systems, the following principles **shall** be followed by users:

8.1.1. Excessive personal use of social media during working hours **is** ~~be~~ forbidden and contraventions to this **may** lead to disciplinary action.

8.1.2. Social media **shall** only be used for personal activities; it is not for use for the transmission, storage or discussion of any NHS or other UK Government information.

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

9. Standards for social media usage – participation in professional debates and promotions

9.1. We recognise the importance of staff joining in with industry/profession discussions. Staff can contribute to reputable discussion forums, networks and/or blogs associated with their profession.

9.2. However, these discussions should be for the benefit of the Trust and add to the 'industry conversation'.

9.3. Staff must behave respectfully and clearly state that views are of a personal nature.

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

10. Seeking social media coverage via corporate channels

10.1. The Trust has established its own presence on social media sites (@buckshealthcare) and staff can contact the communications team if they wish to use them for promotional purposes. The department is open between 9am and 5pm every working weekday and is based in the Trust Offices at Amersham Hospital. They are contactable on 01494 734959 or email BHT.communications@nhs.net The communications team is also available via mobile through the switchboard.

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

11.1. 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.

11.2. All proposed corporate social media accounts must meet certain criteria set out by the communications team (see appendix 3) before they can be passed for approval by the Head of Communications.

11.3. All accounts must conform to guidelines (see appendix 3) provided by the communications team in terms of name, moderation, and published ground rules.

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

11.5. Moderators and administrators for any such accounts must complete and pass the Trust social media training and assessment course (see appendix 2), and undertake regular training updates, plus an annual renewal of their competency assessment.

11.6. 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.

11.7. Staff must not use the Trust logo or the NHS lozenge without prior consent from the communications team.

12. Social media and the media

12.1. If staff 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 email BHT.communications@nhs.net**

13. Breaches of policy

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

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

13.3. If the breach in policy could affect the reputation of the Trust the communications team needs to be informed.

14. Proposed dissemination

14.1. This policy document is available on the Trust intranet and will be circulated on a regular basis via the staff bulletin.

14.2. Advice on this policy is available from the communications team on **ext 4959 (AMH) or email BHT.communications@nhs.net**

15. How compliance will be monitored

15.1. 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.

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

15.3. 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.

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

15.5. Any breaches in standards for social media use as set out in sections 6, 7, 8, and 9 of this policy that are brought to the attention of the Trust will be handled via usual disciplinary procedures.

16. Noncompliance with this policy

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

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

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

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

16.5. A disciplinary sanction may be issued to those staff found not meeting satisfactory levels of conduct by the Trust following an appropriate investigation which will be undertaken in line with the policies mentioned below. The level of sanction that an individual receives will be dependent upon the seriousness and nature of the conduct. In cases of gross misconduct, Trust policies allow for dismissal without notice (summary dismissal). The Trust may also need to refer the matter onto the appropriate regulator for them to consider taking action they deem to be appropriate in line with their policies. Please refer to discipline policy and procedures (BHT POL 032) and to the dignity and respect at work policy (BHT Pol 031).

Appendices

Appendix 1

General guidelines

- The general standards for using social media are to apply common sense. Be respectful, appropriate and professional at all times.

- 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.

- 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've deleted it doesn't mean others haven't already reposted it. Once it's out there, you can't take it back.

- Consider if/how you can be identified on social media channels as an employee either explicitly (ie: in personal information or profile) or implicitly (ie: photographed in Trust uniform). Also consider and be aware of the connections that can be made across different social media platforms, how personal details that you may wish to remain private, such as photos, may become publically 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.

Appendix 2

Corporate social media account checklist

- ☐ Read BHT social media policy
- ☐ Complete corporate social media account application (approval criteria form)
- ☐ Complete moderator/administrator training assessment
- ☐ Application approval

Following application approval the following steps must be taken for any new Facebook sub sites and closed Facebook groups
- ☐ Create leadership team
- ☐ Determine and select appropriate privacy settings
- ☐ Write a page introduction (to be approved by Comms)
- ☐ Write guidelines/ground rules document (to be approved by Comms)
- ☐ Assign site name/handle
- ☐ Create page
- ☐ Set up moderators/admins – including named communications manager
- ☐ Create **ground rules** document (Facebook)

Appendix 3
Application form for service or department level social media accounts

As a communications team we're responsible for protecting the reputation of the Trust. We're keen to make sure any use of social media is within our Trust policy and guidelines but recognise that social media has the potential to transform the way we share best practice and communicate with peers, colleagues and communities. Before setting up a group account that relates to your role at BHT please let us know the following information:

1 Please indicate which type of social media channel you wish to set up (eg Twitter, Facebook etc):

_____

2 Please outline WHO the content of the social media posts/tweets is aimed at (ie your audience):

_____

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

_____

_____

_____

_____

4 Please provide details for this social media account:

Account name:_____

Moderator:_____

Administrators:_____

_____

_____

_____

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?

_____

_____

     Can you provide assurance that all the profiles of the people invited to join the group have the tightest privacy settings

     _____

     _____

Please go straight to question 11

7   If for professional purposes, please provide assurance that all members will have appropriate privacy settings:

_____

_____

_____

_____

Please answer the questions below:

8   Please provide details on how the account will support Trust strategic aims:

_____

_____

_____

9   How will it benefit staff?

_____

_____

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?
[NB Communications team approval must be sought before publishing page header images].

_____

_____

12   How do you intend to manage/moderate this account?
[ie: 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...

_____

_____

_____

13   Please provide evidence of a risk assessment: _____

_____

_____

Thanks for your co operation – the Head of Communications will consider your request and respond as quickly as possible.