



# Social Media Policy

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CEPOL022

## NHS Shetland Document Development Coversheet\*

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**\*To be attached to the document under development/review and presented to the relevant group**

Please record details of any changes made to the document in the table below

Date	Record of changes made to document
21/11/2020	Replaces Social Networking Policy. Greater emphasis on staff conduct on social media sites during and out with working hours, and empowering staff to act as ambassadors for NHS Shetland.
07/01/2020	Formatting changes by Sam Collier, Information Governance Officer

## Contents

1. Introduction.....	5
2. Purpose of this policy.....	5
3. Roles & Responsibilities .....	7
3.1. Executive Responsibility .....	7
3.2. Director of Human Resources & Support Services (DHR&SS).....	7
3.3. Directors .....	7
3.4. Line Managers.....	7
3.5. Staff .....	8
4. Social Media .....	8
4.1. Benefits and concerns .....	8
4.1.1. Benefits of social media .....	9
4.1.2. Key concerns of using social media .....	9
5. Communication.....	9
6. Review, monitoring & evaluation .....	9
Appendix 1 – Business use of social media.....	10
Requesting an NHS Shetland Social Media Presence .....	10
Appendix 2 – Personal use of social media .....	14
Personal use of social media in and away from work:.....	14
Personal use of social media at work: .....	15
Appendix 3 – Acting as an ambassador for your profession or your employer .....	17

## **1. Introduction**

NHS Shetland is committed to supporting the principles of NHS Scotland's Quality Strategy and the local Communications Strategy. One of the fundamental principles of the NHS Scotland Quality Strategy is about:

“Putting people at the heart of our NHS ... our NHS will listen to peoples' views, gather information about their perceptions and personal experience of care and use that information to further improve care.”

Good quality, timely, effective and equitable communications are at the heart of achieving this. We need to provide the right information in the right format at the right time so that people have the information they need in the format they want, and that they have the means of having their say.

Electronic communications should be used in developing and promoting services and engaging with the public. These include the organisation's public website and the use of social media tools which enable the organisation to communicate with patients and members of the public who are not easily reached by other means.

This Social Media Policy provides clear guidance as to what is considered acceptable and unacceptable usage of social media. It is intended that this policy will protect the reputation of NHS Shetland as well as individual staff members.

## **2. Purpose of this policy**

Social media has become part of everyday life and is a valuable method of sharing information and seeking feedback. When using social media sites it is important that staff conduct themselves appropriately. In particular, when discussing NHS Shetland, NHS Scotland or any work related issues, staff are expected to act in accordance with NHS Shetland policies and procedures.

Employees need to have adequate information and clear guidance to enable them to use social media sites in their work and private lives appropriately and in a way that ensures that their personal and professional reputation and that of NHS Shetland is never compromised. This policy is to advise on how social networking sites can be harnessed to improve communications with service users, and also to establish parameters which eliminate any potential harm to employees and the organisation from inappropriate use of social media sites.

It is also important that when staff access social media sites for work-related purposes there are clear guidelines in place regarding this access.

This policy seeks to provide clear guidance to:

- Staff – representing NHS Shetland to communicate with service users and the general public;
- Individuals – in the appropriate use of social media in and out of work; and
- Ambassadors – empowering staff to proudly support their organisation.

Staff should feel equipped to:

- Communicate as best they can through social media;
- Create posts that are effective and in line with policy;
- Manage social media pages well; and
- Handle difficult social media situations.

This policy applies equally to all representatives of NHS Shetland: staff, board members, bank workers, agency workers, volunteers and contractors. For the purposes of this policy the terms 'staff' and 'employees' relate to all of the aforementioned groups.

All staff share the responsibility of appropriate use of social media. NHS Shetland is committed to providing a working environment which is free from harassment, bullying or intimidation of any nature. Every NHS Shetland employee has a responsibility to treat colleagues with dignity and respect. NHS Shetland will not condone or tolerate bullying or harassment in any form, including by any electronic communication means.

The social media field is constantly evolving and it is not possible to cover all circumstances that may occur. Staff who use social media are required to exercise proper judgement, act professionally and consider the appropriateness of any information or image that they post in advance of posting it. NHS Shetland employees are accountable for their actions and activities when using social media sites and are expected to observe at all times the standards, conduct and behaviour outlined in current and future legislation and policies, guidance and legislation, including but not limited to:

- Data Protection Act 2018
- Equality Act 2012
- NHS Code of Practice on Protecting Patient Confidentiality
- Eliminating Bullying and Harassment Policy
- Managing Conduct Policy
- Codes of Conduct
- New start IT forms

In addition staff must recognise the risk of breaching the regulatory or professional codes of conduct that applies to their professional bodies, e.g.

<https://www.nmc.org.uk/standards/code/>; <https://www.hcpc-uk.org/standards/standards-of-conduct-performance-and-ethics/>.

Staff who are subject to abuse through electronic communication should immediately notify their line manager.

Staff who create or circulate any electronic communication which is deemed to be discriminatory or offensive to any recipient, either internal or external to NHS Shetland, will be in breach of this policy.

Application of this policy should be considered in conjunction with all other relevant organisational policies. This policy replaces the Social Networking Policy.

### **3. Roles & Responsibilities**

Responsibility for this policy sits with a number of individuals. Ultimately, each member of staff should take responsibility for their own use of social media.

#### **3.1. Executive Responsibility**

Overall responsibility for the policy lies with the Chief Executive (CE). The CE or their delegated officer will ensure the policy is developed and kept up to date.

The Corporate Services office will provide final sign off for any new proposal to introduce the use of social media for NHS Shetland purposes.

#### **3.2. Director of Human Resources & Support Services (DHR&SS)**

The Director of HR&SS has responsibility for two key aspects of the policy:

##### **1. Human Resources (HR) Policies**

The Director will ensure that NHS Shetland's HR policies are compatible with and support the implementation and use of this policy where appropriate.

##### **2. IM&T Support**

The Director (through the Head of IM&T) will ensure that NHS Shetland's IT Infrastructure will support the appropriate use of social media and where necessary the required monitoring of the use of NHS infrastructure for social media.

The Director will ensure appropriate security is in place on NHS systems to protect the organisation's data from the implications of staff accessing and using social media.

#### **3.3. Directors**

All Directors are responsible for agreeing with their managers any proposal for the use of social media within their area of service responsibility.

The Directors should ensure that the reason, benefits and risks associated with using social media have been appropriately identified and managed. This discussion should include the practicalities of 24 hour site monitoring, or a clear disclaimer that this is not the case and also how adverse comments might be handled. Please see Appendix 1 – Business use of social media for further information.

#### **3.4. Line Managers**

Individual managers are responsible for ensuring any issues associated with their staff's use of social media is, where necessary, appropriately managed using the Board's HR policies.

Managers are also responsible for the appropriate use of social media by their department or service in relation to their service's needs. This will include agreeing with staff whether and how this might be used, evaluating the impact and benefits and ensuring that any risks are identified and managed.

Managers should also ensure that all staff potentially impacted by the use of social media in a particular service are appropriately engaged in the development of social media use and are aware of their responsibilities (this may include colleagues from other departments/services as appropriate).

Managers are responsible for ensuring arrangements are in place for the ongoing monitoring of any social media used within their service.

(For guidance on the use of social media by a service please see Appendix 1).

### **3.5. Staff**

Individual members of staff are responsible for their own use of social media. This should be in line with the guidelines incorporated within this policy.

All staff are responsible for any information they make available on social media, whether this was posted during work hours, breaks or when not at work.

When posting on social media sites there should be no expectation of privacy, regardless of the privacy settings applied to individual accounts. Content uploaded to, and opinions expressed via social media must be considered to be in the public domain.

Staff should be aware that inappropriate use of social media will be managed using the relevant HR Policies.

## **4. Social Media**

Social media is a general term used to describe a range of online technologies and practices which are managed and controlled by the users themselves. It allows users to connect with each other and share written material, photographs and videos.

Examples of social media include, but are not limited to:

- Online forums
- Vlogs, blogs
- Social networks
- Podcasts
- Photos
- Videos and webcasting
- Real-time web communications (chat, chat rooms, video chat, instant messaging)

The most commonly used social media services for work related purposes are Facebook, Twitter, Instagram, LinkedIn and YouTube. However this policy is not limited to those services.

### **4.1. Benefits and concerns**

There are a range of benefits surrounding the use of social media in the work context; however it is not always the most appropriate option. Consideration needs to be given to the overall communication strategy, business need and resource levels.



We recognise that social media is live 24/7, and we only expect staff to interact with work related social media within the context of their normal working patterns.

#### **4.1.1. Benefits of social media**

- Increases access to audiences and improves accessibility;
- Enables citizen engagement and encourages partner and stakeholder relationships;
- Greater scope to refocus communications with partner and stakeholder relationships;
- Improves long-term cost effectiveness of communications;
- Improves credibility;
- Increased speed of public participation including feedback and input;
- Reach of specific audiences on specific issues (including emergency situations); and
- Reduces the dependence on traditional media channels.

#### **4.1.2. Key concerns of using social media**

- Staff need to be empowered to engage and to act as ambassadors for NHS Shetland;
- How staff will respond to inappropriate comments through the use of social media;
- Staff need to be aware of the policies that make clear what staff can and cannot do (specifically this document and the Code of Conduct covering all staff members);
- Consideration needs to be given to the governance of sites and content; and
- Staff need to be aware of guidelines – and clear about the distinction between engaging as an individual or as a representative of the organisation.

### **5. Communication**

This policy will be communicated through an all-user email and in Team Brief. Staff will periodically be reminded about the policy and examples of good practice flagged in Team Brief articles.

### **6. Review, monitoring & evaluation**

This policy will be monitored and reviewed every three years or sooner in light of any legislative changes or national NHS changes.

Individual managers (Directors) are responsible for ensuring the evaluation and monitoring of any NHS Shetland social media presence within their department/directorate.

## **Appendix 1 – Business use of social media**

NHS Shetland recognises the benefits to the organisation of using social media and networking sites to promote and develop services and communicate with patients and members of the public. This may include a department establishing a social networking site to enable them to fulfil this role. Consent for any social media presence that is developed in the name of NHS Shetland must be sought from the Corporate Services Department. A checklist of considerations before making a request is included below. This is not an exhaustive list, and depending on the type of request, there may be other issues which need to be thought through in conjunction with Corporate Services/IM&T and Information Governance before a social media presence is established.

### **Requesting an NHS Shetland Social Media Presence**

Any member of staff or department considering the use of Social Media should follow the following steps:

#### **Step 1 – Consider how Social Media would be used**

Please give consideration to the following points:

- Who are you trying to reach, what platform do you intend to use (e.g. Facebook, Twitter) and is your proposal the most appropriate medium?
- Have you considered what you are planning to post – whether you are looking for engagement and communication, or to disseminate information? If people can comment on the information you publish, have you given thought to how / if you can / should moderate this and be explicit about moderation on your social media presence?
- How will you set up and thereafter access the social media account? Will Facebook (for example) be sending NHS page notifications to your personal account? Do you wish to set up a separate account to manage this? Who will have rights to publish new information, and update existing information?
- How will you respond to positive & negative feedback?
- How often will your social media content be checked and who will do this in your absence?
- How will you evaluate its impact?
- How will you communicate to colleagues so they can signpost interested service users?
- What engagement should you have with staff, patients, patient groups/carers in developing the social media presence (including staff who might be affected from other departments/services)?
- Does this have the support of the departmental manager and relevant service director?

If you would like to discuss any of the above please feel free to discuss this with the Corporate Services office and/or IM&T department.

## **Step 2 – Discuss and agree proposal with Line Manager / relevant Director**

Please ensure your line manager is aware of and in agreement with the proposal.

## **Step 3 – Submit proposal for ratification by Corporate Services Department**

Once you have an answer to the points above and have the support of your Line Manager/Director request a social media presence through Corporate Services:

Telephone: 01595 743064 or email [shet-hb.corporateservices@nhs.net](mailto:shet-hb.corporateservices@nhs.net)

Your request will be reviewed in line with the Board's overarching Communications Strategy and, if required, discussed with IM&T.

Co-ordinating requests for social media sites through Corporate Services gives the organisation a complete picture of the various communication channels in use and allows Corporate Services staff to respond effectively to media enquiries about information on the social media sites.

## **Step 4 – Up and running**

**Your posts** – once your service presence is established consider the following:

- Whether direct messaging should be switched on/off. Similarly with direct posting, do you wish this to be active, or only have your posts visible?
- Do you want to publicise your response times and monitoring in your page description.
- How frequently are you intending to publish information? Can you plan to publish at least every 2/3 days? (The more often you plan to publish content, the more likely your content is to be seen by your audience).
- Do you have a good variety of content planned - a mix of your own and shared content?
- Do you have a mix of types of posts – text only, with images, videos etc. Some people engage better with images and videos and this helps your posts to be seen.
- Can you use some good hashtags if appropriate on Twitter/Instagram?
- Are there other active pages and content (e.g. Healthy Shetland, national campaigns, other local pages) that you can tag to both spread the word about your post and to give others an opportunity to get involved?
- Try to ask your audience an engaging question, but importantly make this a question that is easy to answer in a public space. Think through the answers people might post before you publish. For example 'How can we improve our Sexual Health Clinic' is a much harder question to answer publicly than 'Give us a 'Yes' (or a like/thumbs up) if you have eaten more than 5 portions of fresh fruit/veg today'. Make it easy for your audience to engage with you.
- What is the point of each post? If it is to give information, make sure you give all the relevant information and provide a link for further details, if possible.

- If you are sharing another post, have you checked your links are valid and the content is appropriate?
- Check how a link is pulling through and how it looks in a post before you publish.

**Tone of voice** – are your posts:

- Chatty and fun?
- Professional?
- Corporate?
- Factual?
- Direct?
- Conversational?
- Grammatically correct?
- Spelled correctly?

Tone is particularly important if more than one person is posting as writing styles can differ considerably.

For work purposes it is advisable to not:

- Use dialect (somebody may not understand the post)
- Add numerous emojis (they often display differently on different platforms)

### **Dealing with comments**

If you create a post it is advisable that you check for comments. This guidance is not prescriptive but generally:

- Respond to requests for factual information resulting from the post.
- React to positive comments (e.g. like the comment or thank them).
- Be clear how you will deal with inappropriate comments – e.g. comments that are critical of individuals, adverts, containing profanities.
- There is a danger in deleting comments as this can be seen as a lack of transparency. Generally comments that are critical of individuals, unrelated adverts or swearing/rants are okay to be deleted. If there is an opportunity to correct misinformation, or pass useful information to the poster, consider whether that is a more useful response.
- Do be mindful that some of your audience may swear normally within their communication, so consider the context of their post.
- Consider whether to reply to the more general negative comment – will there be any benefit to the service in publicly engaging or is the comment inaccurate (and therefore potentially damaging) and you can politely correct the poster, or send them a link to factual information.

- Internet trolling is where people deliberately post inflammatory and derogatory comments, often on a company page, to encourage a strong negative response. Trolling is not common, but is something to be mindful of.

If you decide to reply to a negative comment, consider these general guidelines:

- Take your feelings on negative comments out of your response – negative comments are generally about the poster’s experience and not about the post.
- Who is going to compose replies to negative comments? The quicker you can reply the better, so consider who is most likely to have capacity.
- Where possible, seek a second opinion before posting your reply.
- Think about how you would reply in person, face to face, at work, with an audience, to this sort of comment.
- Take the conversation offline as soon as possible – do not encourage any comment wars in public and suggest that the poster emails/calls you to discuss further.
- Some negative comments are often best left unanswered. These are most often vague dissatisfaction that is not offensive as such, but usually sarcastic in tone. It is okay to trust your readers to see these comments and interpret them for themselves as general dissatisfaction that there is no right/wrong answer to.

### **Standard replies to negative comments:**

What will your standard reply be? Examples might be:

- Hi [NAME], we are sorry you feel you have had a negative experience....
- Hello [NAME], we are sorry you are not happy with...

...followed by....

- If you would like to speak to us in more detail about your experience you can....
- Use the original poster’s name
- Give helpful information/links
- Call us on/email us at
- Refer to complaints process
- Refer to independent advice

Think about whether you want to sign off personally to show who has responded (this will be a judgement call on individual posts).

### **And finally access...**

Think about who has access to your social media account and review the access at regular intervals. When somebody leaves the organisation, do take steps to ensure they can no longer access a work social media site. If they were an admin on an account, make sure you have an alternative admin assigned before removing them.

Where possible, have at least two admins on your account.

## **Appendix 2 – Personal use of social media**

### **Personal use of social media in and away from work:**

Social media sites enable people to maintain contact with others. However, through the open nature of such sites, it is also possible for third parties to collate vast amounts of information about you, your family, colleagues, and personal/professional life.

Whilst communication through social networks may be considered to be a personal matter, this is not the same as it being private. In a lot of cases, written conversations inside these networks can be found through search engines such as Google. Even in cases where only your contacts can see what you write, there is a possibility that one of them will screenshot and forward what you say and make it visible to a wider audience. As a result, personal conversations within social media networks should always be considered public rather than private.

Consider the following when using social media for personal use:

- You are personally responsible for any content you publish;
- Understand your online privacy settings – check your settings and understand who can see the information you publish and your personal details. However in general, nothing written on social media sites is truly private, regardless of any privacy settings you may have set;
- Follow your organisational and IT code of conduct and this Social Media Policy;
- If you do talk about work you do for NHS Shetland you should make it clear that you are speaking for yourself and not on behalf of NHS Shetland. Use a disclaimer such as ‘the views expressed here are my own and do not necessarily reflect the views of my employer’;
- Do not let your personal use of social media interfere with your job; and
- Think about what your personal digital strategy is i.e. in what way you are engaging with social media as an individual, what networks are you appearing on, what are you posting?

All staff should be mindful of the information they disclose on social networking sites, especially when they:

- identify their association with their employer;
- discuss their work in any way;
- can be identified as a staff member by other means (for example, by mentioning “working at an NHS Shetland location”).

NHS Shetland has a reputation to uphold and the public must be able to trust staff’s integrity, confidentiality and values. To this end, individuals should consider carefully whether they identify themselves as a member of staff by revealing their place of work and/or occupation). Employees must not:

- engage in activities on social media which might bring NHS Shetland into disrepute;

- post information relating to patients and/or patients relatives;
- post videos or images taken on health premises;
- post offensive or obscene information or material;
- disclose privacy marked or commercially sensitive information;
- disclose their work email address or work telephone numbers on personal social networks;
- use social media in any way to attack or abuse colleagues;
- refer to or comment about colleagues, patients or the service in an abusive or harassing manner;
- post comments, videos or photos that reveal some form of work-related misconduct, for example 'tweeting' about feigning illness or avoiding work;
- in the course of understanding their duties as an employee use any of the organisation's social media networks to express personal views which NHS Shetland would not wish to be connected with.

NHS Shetland employees must be considerate of their personal and professional boundaries when accepting or requesting to join a social network that may include colleagues, patients or relatives. If staff are in any doubt as to how this would impact on a specific situation they should seek advice from their line manager.

NHS Shetland will not proactively monitor an employee's social networking activity and does not intend to be prescriptive about how employees should conduct themselves in their private lives. However all internet activity by staff on the NHS Shetland network is logged and stored. Where concerns regarding usage, or material is brought to the attention of the organisation which may be considered to be inappropriate, NHS Shetland will investigate in line with the appropriate policy or legislation, for example, Managing Conduct, Eliminating Bullying and Harassment Policy, Data Protection. Internet logs may be used as part of any investigation.

The organisation understands that employees may wish to use their own mobile devices while they are at work. Employees must limit their use of social media on their own equipment to their official rest breaks.

### **Personal use of social media at work:**

In addition to the above considerations, in working hours, staff should limit their access to personal social media sites through the NHS Shetland network. This is important for the reasons outlined below:

- Data streaming that is not for work-related purposes (e.g. catching up on the previous evening's TV) is bandwidth intensive and has the potential to detract from core clinical and administrative systems. The only data streaming usage acceptable through the NHS Shetland network is for relevant work and educational purposes.
- Posting extensive comments or being visible on-line for long periods during working hours, even if it is in an employee's designated break periods, has the potential to

cause reputational damage, as external observers will not recognise break periods from working times.

- Personal social media usage on NHS Shetland premises has the potential to display on screen inappropriate materials that can be seen by others.



## Appendix 3 – Acting as an ambassador for your profession or your employer

Tips for participating online for a work-related purpose:

- **Be professional.** You are a representative of NHS Shetland and in certain networks you might be the sole organisational voice;
- **Be transparent.** Wherever possible, disclose your position as a representative of your organisation. If you are talking about your work, use a disclaimer;
- **Be clear about your aims.** What story you are trying to tell, to whom and why;
- **Be responsible. Be honest.** Abide by your organisational and IT code of conduct, HR and Social Media Policy;
- **Be helpful.** When you gain insight share it with others where you can;
- **Be credible, be accurate, fair and thorough.** Stick to your area of expertise;
- **Be judicious.** Liable, defamation, copyright and data protection laws apply;
- **Be integrated.** Wherever possible, align online with offline communication;
- **Be inclusive.** Make every effort to be accessible and connect with all relevant communities;
- **Be personable.** Participating online is not about delivering staid corporate messages. It is about conversations between individuals and should be treated that way;
- **Be respectful.** Pause and think before posting. When disagreeing with other opinions, keep it appropriate and polite;
- **Be careful.** Never give out personal details like your home address or phone number;
- **Be responsive.** Visit the online spaces where you have a presence regularly and respond positively and promptly to conversations;
- **Be willing to learn** from others;
- **Be creative.** New tools means new approaches; and
- **Be accountable.** Online participation is a multi-stakeholder process where everyone is accountable for their own actions.

Remember: participating online results in your comments being permanently available and open to being republished in other media. You may attract interest in you as an individual, so proceed with care whether you are participating in a professional or personal capacity. If you have any doubts, take advice from your line manager.

Photographs taken in clinical or public areas that are intended for inclusion on social media sites must have a valid business or clinical context and must not compromise patient, visitor or staff privacy under any circumstances.