Use of Social Media Policy

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Name of author and title:	Clare Hammond, HR Manager
Date Written:	September 2018
Name of responsible committee/individual:	Monica Green, Director of HR
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Target audience:	All Staff, Volunteers, Agency Workers Members of the Temporary Workforce Services Register
Compliance with CQC Fundamental Standard	Good Governance Dignity and Respect
Compliance with NHSLA/CNST:	N/A
Compliance with any other external requirements (e.g. Information Governance)	N/A
Associated Documents:	Anti- Harassment and Bullying Policy Disciplinary Procedure Email Acceptable Use Policy Handling Media Enquiries Policy Professional Code of conducts Internet acceptable Use Policy and Procedure Information Governance and Data Protection Policy Freedom to Speak Up: Raising Concerns (Whistleblowing) Policy

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Version Control Table

Version number and issue number	Date	Author	Reason for Change	Description of Changes Made
1	December 2014	Jacqui Pearce, HR Adviser	New policy	
2		Claire Parnell Snr HR Manager	Policy Review	Minor
3	September 2018	Clare Hammond, HR Manager	Policy Review	Section 4.4

Consultation Table

This document has been developed in consultation with the groups and/or individuals in this table:

Name of Individual or group	Title	Date
HR Team		August 2018
Workforce Policy Group		September 2018
Communications Team		November 2018

This information may be made available in alternative languages and formats, such as large print, upon request. Please contact the document author to discuss.

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1. Introduction

1.1 Social media is an online platform or app that allows parties to communicate instantly with each other or to share data in a public forum. This includes social forum such as Twitter, Facebook and LinkedIn. Social media also covers blogs and video and image-sharing websites such as YouTube and Instagram. Employees should be aware that there are many more examples of social media than are listed here and this is a constantly changing area. Employees should follow these guidelines in relation to any social media or online platform that they use.

1.2 The Trust's Internet connection is intended primarily for business use. Social media, like other ESHT communication tools, is used to improve understanding of the Trust and its work, promote health and engage with members of staff and the public. Social media is increasingly a part of many of our professional lives. For many members of staff, social media is an important channel for professional communication and gaining a work profile.

1.3 This policy on the use of social networking websites is in addition to the Trust's existing policy on email and internet use. It sets out for staff and managers what is regarded as acceptable and unacceptable usage of social media, and to ensure confidentiality and safety of patients and staff and that the reputation of the Trust and that of the relevant profession is upheld.

1.4 The duty to act in a manner that is in line with the conditions of this policy does not only apply when an employee is at work, but at all times when a connection to the Trust or NHS has been made**.**

2. Purpose

2.1. Rationale

2.1.1 The purpose of this policy is to set out the clear expectation if a member of staff, or a team, service or department that uses social media or digital platforms and identifies that they have an association with the Trust s/he will behave appropriately

- linked to and consistent with the Trust's values

- and with his/her professional code of conduct

- Overall, the way you behave on social media is simply an extension of your behaviour at work

2.1.2 This policy aims also:

- to outline to employees what is acceptable use of social media linked to their employment

- to make a clear distinction between acceptable usage of social media at work and in employees' personal lives

- to encourage employees to be mindful of what content they share on the internet (including but not limited to downloading, uploading, posting, sharing etc)

- to ensure appropriate standards of confidentiality are maintained.

2.2. **Principles**

2.2.1 When using any social media site, if an employee has identified their association with the Trust, it is expected that they behave in a manner which adheres to Trust values, acknowledges the duty of care that they have to patients, their colleagues and the Trust.

2.2.2 Remember that information that employees publish via a social media site is not considered to be private. Employees will be held accountable for any information posted which is challenged on the basis that it compromises themselves, their colleagues, the Trust, the NHS or their profession while at work and in their personal time.

2.2.3 Action will be taken against members of staff whose use of social media is seen to be inflammatory, derogatory, slanderous, discriminatory, abusive or a breach of confidentiality be it against the Trust as an organisation, members of staff, patients or individuals connected to the Trust.

2.2.4 The Trust has no jurisdiction over employees posting non-work related images or comments on social media sites unless the Trust may be brought into disrepute by association.

2.2.3 Employees will be subject to Data Protection and Information Governance laws and regulations with regard to the sharing of any confidential personal data or images of patients and colleagues on social media sites.

2.3. **Scope**

2.3.1 This policy applies to all staff employed by East Sussex Healthcare NHS Trust, including permanent staff, temporary staff, TWS bank staff, agency workers and volunteers.

2.3.2 This policy applies to all social medial and digital platforms, for example Twitter, Facebook, LinkedIn, YouTube and Instagram. It should be noted that the internet involves fast moving technologies and it is therefore not possible to cover all circumstances.

2.3.3 All members of staff need to be aware that if they believe that they are using these sites with enhanced privacy settings applied, this does not exempt them from the guidelines outlined in this policy.

3. **Definitions**

Social media: For the purposes of this policy, social media is any type of online communication channel dedicated to community-based input, interaction, content-sharing and collaboration. Social media allows people to communicate with each other or to share data in a public forum.

4. **Accountabilities and Responsibilities**

4.1 **Senior Managers**

Are accountable for ensuring a framework is in place and that managers and staff comply with the arrangements set out in this procedure.

4.2 **Managers' responsibilities**

- To ensure staff are aware of and understand this policy

- To react in an appropriate manner when informed of instances where behaviour is not in accordance with the policy that is set out below

- The Voluntary Services Manager will need to ensure that all volunteers are aware of the policy

- The Temporary Services Manager will need to ensure that all bank and agency staff are aware of the policy

- Ensure a framework is in place that advises members of staff on the team, service or department's approach to having a social media presence

4.3 **Employees' responsibilities**

- Employees must ensure that they are aware of and comply with this policy to uphold the reputation of the Trust and their profession. Employees must make sure that they conduct themselves online in the same manner that would be expected of them in any other situation, to uphold the reputation of the Trust.

- Members of staff are encouraged to maintain standards of professionalism and will be held to account for any inflammatory, derogatory, slanderous, discriminatory or abusive statements.

- Relevant professional bodies (NMC, GMC etc) will have published guidance covering social media use. We recommend reading that alongside this policy. In the event of this policy contradicting your professional body's guidance, the professional body's guidance should take precedent.

- Employees should be aware of privacy settings in the social media platform that they are using, and they are set up appropriately. The content posted to social media platforms is usually publically accessible. It is a good idea to test what you can see publically on social media platforms. You can do this by Googling your name or by visiting your social media profiles when you are not logged in. On many sites (including facebook) the help page can often help you understand what information is publically available.

- If a member of staff has concerns about the online conduct of any other employee, this should be raised with an appropriate manager in line with the Trust's Freedom to Speak Up: Raising Concerns (Whistleblowing) Policy or Anti- Harassment and Bullying Policy

- Employees must ensure they do not breach Data Protection or Information Governance laws and regulations when sharing information and/or images on social media sites.

4.4 Communications Team: support and monitoring

4.4.1. If a member of staff or team or department is interested in using social media as part of their work and would like support, please contact the communications team. They can help you decide which social media platform to use, based on your target audience and provide advice on what kind of content will be most successful online.

4.4.2. You can contact the communications team, who are based at Eastbourne DGH, on esh-tr.communicationsesht@nhs.net or 01323 435838.

4.4.3. If you are thinking about using social media on behalf of your team, service or department it is a good idea to talk to your line manager. The communications team can help you and your manager discuss the options and test your ideas.

4.4.4. The ESHT communications team use monitoring tools to pick up references to the Trust, Conquest Hospital, Eastbourne District General Hospital, our community hospitals and community services and other sites online and in the media. These tools are used to help the team understand what is said about the Trust in the media and to keep track of new issues and stories involving the Trust.

4.5 Human Resources Department

To provide advice and guidance to managers and employees on the application of this policy.

In addition:

- When registering with a website from a Trust Device, employees must read the site's terms and conditions; social networking sites may not be accessed on Trust devices and have access restricted in the form of an IT block, (except for teams with approved permission).

- Trust confidential or business information must not be loaded onto a personal social networking site.

- Employees must examine carefully any email or message coming from social networking sites or contacts, as these may be unreliable, contain malicious codes, be spoofed to look authentic, or may be a phishing email
- Employees should not conduct themselves in ways that are detrimental to the employer.

- Employees should take care not to allow their interaction on these websites to damage working relationships between members of staff and patients of the Trust.

- Employees should not forward inappropriate content to other members of staff; employees who do so are in breach of Trust Policy and further action may be taken under the ESHT Disciplinary Procedure.

- Employees must report any inappropriate content sent to them to their line manager; to not do so is in breach of Trust policy and professional guidelines and further action may be taken under the ESHT Disciplinary Procedure

5. Using work related Social Media

5.1 The Trust uses social media sites as part of its communication strategy and in recruitment. The Communications Department has authority to speak on behalf of the Trust and is responsible for managing the Trust's official sites.

Increasingly, teams, services and departments have their own social medial presence. This is an important way to communicate and engage with members of staff and the public.

5.2 Social media may be used by employees for work related purposes with their manager's permission to share questions, answers, ideas and knowledge with a broad group of fellow professionals with the aim of improving services and patient care.

5.4 The Trust blocks access to certain websites to minimize inappropriate usage.

6. Personal Use of Social Media sites

6.1 Employees are allowed to access social media websites from the organisation's computers or devices or their own devices such as mobile phones, laptops, palmtop and hand held devices during official break times only.

6.2 ESHT employees must be considerate of their personal and professional boundaries when accepting friend requests 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.

Work colleagues

- When interacting with colleagues online, employees should be mindful of their responsibility to be professional and courteous and never use social media to attack or abuse any colleagues.

- When uploading content that includes other employees, for example, pictures from a social event get permission from colleagues first and do not post anything they have not expressly given consent to. If a colleague asks for something that includes them to be removed, it should be removed immediately.

- On social media sites, people can show support or agreement for comments, pictures or phrases. Anyone who does this will attach their name and implied support to the material and may call their conduct into question. Employees should be aware of the consequences of using any social media site to post content of any kind that conflicts with information they have provided to the

Trust. These actions could bring about disciplinary proceedings that could result in dismissal.

6.3   In any instances where there are any comments, questions or observations which the employee wishes to raise in connection with their employment with the Trust, either positive or negative, these should be raised through the appropriate internal channels rather then these views being expressed on social networking sites. Additional guidance and support is available through the Trust policies and procedures (as listed in the associated documents), Line Managers or the Human Resources Department.

6.4   Freedom of speech is recognised and use of social media is encouraged on the condition that it contributes to positive innovation and improvements of the Trust and it's services to patients. This policy ensures that each employee participates online in a respectful manner, protecting the NHS reputation.

7. Use of Social Media in the Recruitment process

Unless it is in relation to finding candidates (for example, if an individual has put his/her details on social media websites for the purpose of attracting prospective employers), the HR department and managers will not, either themselves or through a third party, conduct searches on applicants on social media. This is because conducting these searches during the selection process might lead to a presumption that an applicant's protected characteristics (for example, sexual orientation or religious beliefs) played a part in a recruitment decision.

8. Disciplinary action over Social Media use

8.1 All employees are required to adhere to this policy. Employees should note that any breaches of this policy may lead to disciplinary action. Serious breaches of this policy, for example incidents of bullying and harassment of colleagues or social media activity causing serious damage to the organisation, will constitute gross misconduct could lead to summary dismissal.

8.2 Any communications that employees make through social media must not:

8.3 Bring the Trust into disrepute, for example by:

- Criticising or arguing with work colleagues or patients
- Making defamatory comments about individuals or the Trust
- Posting images/videos that are inappropriate or links to inappropriate content.

8.4 Breach confidentiality, for example by:

- Disclosing any patient information
- Giving away confidential information about an individual (such as a colleague or organisation)
- Discussing the Trust 's internal workings (such as future business plans that have not yet been communicated to the public)

8.5 Do anything that could be considered discriminatory against, bullying or harassment of any individual, for example by:

- Making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion, belief or age
- Using social media to bully any another individual (including but not limited to employees or patients of the Trust)
- Posting images that are discriminatory or offensive, or links to such content.

9. **Equality and Human Rights Statement**

An Equality and Human Rights Impact Assessment has been carried out and no adverse impacts on people with protected characteristics were identified.

10. **Training**

Please refer to the [Induction Policy and Procedure](#) and [Mandatory Training Policy](#) and the Training Needs Analysis.

11. **Monitoring Compliance with the Document**

Monitoring Table

Element to be Monitored	Lead	Tool for Monitoring	Frequency	Responsible Individual/Group/ Committee for review of results/report	Responsible individual/ group/ committee for acting on recommendations/action plan	Responsible individual/group/ committee for ensuring action plan/lessons learnt are Implemented
Compliance with the procedure	HR Manager	Process review	On going	HR SMT	HR SMT	HR SMT
No. incidents	Deputy Director of HR	Incident report	Quarterly	HR SMT	HR SMT	HR SMT

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12. **References**

- NHS Employers Briefing 87: HR and Social Media in the NHS

- NMC The Code: Standards of Conduct, Performance and Ethics for Nurses and Midwives

Due Regard, Equality & Human Rights Analysis

Title of document: Use of Social Media Policy

Who will be affected by this work? All staff

Please include a brief summary of intended outcome: To set out the clear expectation if a member of staff, or a team, service or department uses social media or digital platforms and identifies that they have an association with the Trust s/he will behave appropriately

		Yes/No	Comments, Evidence & Link to main content
1.	**Does the work affect one group less or more favourably than another on the basis of:** (Ensure you comment on any affected characteristic and link to main policy with page/paragraph number)		
	• Age	Yes	Section 7
	• Disability (including carers)	Yes	Section 7
	• Race	Yes	Section 7
	• Religion & Belief	Yes	Section 7
	• Gender	Yes	Section 7
	• Sexual Orientation (LGBT)	Yes	Section 7
	• Pregnancy & Maternity	Yes	Section 7
	• Marriage & Civil Partnership	Yes	Section 7
	• Gender Reassignment	Yes	Section 7
	• Other Identified Groups	Yes	Section 7
2.	**Is there any evidence that some groups are affected differently and what is/are the evidence source(s)?**	No	
3.	**What are the impacts and alternatives of implementing / not implementing the work / policy?**	Section 7	
	Please evidence how this work / policy	Section 7	

4.	seeks to "eliminate unlawful discrimination, harassment and victimisation" as per the Equality Act 2010?	
5.	Please evidence how this work / policy seeks to "advance equality of opportunity between people sharing a protected characteristic and those who do not" as per the Equality Act 2010?	Section 7
6.	Please evidence how this work / policy will "Foster good relations between people sharing a protected characteristic and those who do not" as per the Equality Act 2010?	Section 7
7.	Has the policy/guidance been assessed in terms of Human Rights to ensure service users, carers and staff are treated in line with the FREDA principles (fairness, respect, equality, dignity and autonomy)	Yes; Section 7
8.	Please evidence how have you engaged stakeholders with an interest in protected characteristics in gathering evidence or testing the evidence available?	WPPG
9.	Have you have identified any negative impacts or inequalities on any protected characteristic and others? (Please attach evidence and plan of action ensure this negative impact / inequality is being monitored and addressed).	Section 7