

## **Social and Digital Media Policy and Guidance for HSE Employees April 2012**

The Social and Digital Media Policy and Guidance document, dated April 2012, provides guidance and direction to HSE staff when utilising all types of online social media sites and networks. This policy applies to all HSE employees either participating personally, or communicating on behalf of the HSE, while online

This proposed guidance document should not be considered in isolation but needs to be read in conjunction with a number of other HSE policy documents, including the HSE Digital Communications Strategy dated June 2011, Data Protection Guidelines, and the HSE Code of Standards and Behaviour. Some relevant extracts are emphasised below and the relevant policies can be read in full on [HSE.ie](http://HSE.ie).

Misuse or abuse of social and digital media can cause significant injury to third parties and can also impact negatively on the credibility of the HSE. This is particularly relevant in the context of safeguarding patient care and personal information. The HSE is potentially vicariously liable for injury caused by misuse or abuse of social and digital media channels by its employees. Consequently the HSE takes any misuse or abuse of social and digital media by HSE employees very seriously and can lead to significant disciplinary and legal actions.

Like all employee policies, it is the responsibility of local line management to address any issues that arise in relation to breach of these policies and regulations. There is also a significant personal responsibility placed on each employee.

### **Information Security Policy**

- Each user is responsible for respecting and protecting the privacy and confidentiality of the information they process at all times

### **Electronic Communications Policy**

- Confidential information regarding HSE business practices and procedures or personal information about any HSE patients, clients or employees must not be posted or discussed on internet social networking websites, internet video hosting/sharing websites, internet discussion forums, message boards or internet chat rooms.

The HSE reserves the right to take such action as it deems appropriate against users who breach the conditions of these policies or Data Protection regulations. HSE employees who breach these policies may be denied access to the organisation's information technology resources, and may be subject to disciplinary action, including suspension and dismissal as provided for in the HSE disciplinary procedure.

### **HSE Code of Standards and Behaviour**

There is an implied term of mutual trust and confidence between employer and employee in all employment contracts. A very negative, defamatory or damaging posting or communication by an employee may entitle the employer to proceed with the HSE Disciplinary Process, including investigation, and discipline up to dismissal if warranted. If defamatory material is posted on a social networking site, defamation claims may arise against the employee.

Employees must not improperly disclose, during or following termination of employment, information gained in the course of their work.

Employees are expected to comply with the Code of Standards and Behaviour at all times. Breaches of the code will constitute a breach of the terms of employment and may result in disciplinary action being pursued in accordance with agreed procedures.

### **Social Media Policy**

#### **1. Representing the HSE and the Health Service**

The same rules that apply to our communications in traditional media, like newspapers, television and radio, also apply in online news or social media sites or networks.

- HSE Communications is providing leadership and guidance to all HSE services and directorates in how best social media can be used to communicate with HSE staff and people using our services. In this regard, any official comment from the HSE to be broadcast online should be routed through either national or regional Communications staff in the first instance.
- Any HSE service that wishes to establish a social media profile or site for a health service should seek communications support via the Communications Resource Planning Group. No HSE service is authorised to establish such a profile, page or site without completing this process and receiving the appropriate guidance and training. Local managers are then responsible for the ongoing management and governance of authorised social media pages or profiles and consequently must be familiar with this policy document. Examples of existing HSE social media sites include:  
[www.facebook.com/HSEquit](http://www.facebook.com/HSEquit)  
[www.facebook.com/teenmums2B](http://www.facebook.com/teenmums2B)  
[www.twitter.com/HSElive](http://www.twitter.com/HSElive)  
[www.youtube.com/HSEIreland](http://www.youtube.com/HSEIreland)  
[www.twitter.com/HPSCIreland](http://www.twitter.com/HPSCIreland)

- HSE Communications will ensure that any official comments made online meet our obligations under the Data Protection Act, especially in relation to private patient information. It will also be cognisant of any copyrights, trademarks, rights of publicity, and other third-party rights in the online social media space, including user-generated content (UGC).
- Any requests from the media, public representatives or other organisations for official comment from the HSE on any topic should be referred to the staff of the National Communications Directorate – either the National Press and Media Office or one of the 4 Area Communications Offices (contact details enclosed).
- HSE Communications will ensure, through its network of experts in clinical and service matters, that information given in an official capacity from the HSE through social media is accurate and up to date.

## **2. Personal Social Media Profiles**

Over 2 million people in Ireland have a Facebook profile, and most of them use it on a weekly or daily basis. This is one only of a range of websites that allows visitors to establish a profile and enter into debate, comment and conversation online, like Youtube, Twitter, Pinterest, news sites like the Journal.ie and many more.

Everyone is entitled to explore and engage in social media communities in a personal capacity, at a level at which they feel comfortable. As time passes, more and more people tend to link together in this way, and many social media sites will continue to allow you to register personal information like your hometown, education, likes, interests - and details of your employer.

If you choose to identify yourself as a HSE or health services employee on social media profiles, or in your commentary on personal topics within social media sites, it is important to use common sense and be aware of the nature of your comments and their possible consequences. It is important that all our employees are aware of the implications of engaging in forms of social media and online conversations that reference the HSE or your association with the HSE. Patient privacy, Data Protection requirements, defamation law and basic duty of care all still apply in comments that are made while off-duty and online. If an employee comments online in a personal capacity while identified as a HSE or health service employee, these comments can be attributed or perceived as the official position of the HSE.

As a healthcare worker or a person working within the health system, people with whom you converse may take health related decisions based on your comments – so there is a particular responsibility on you to think carefully before you post. Line managers may use the HSE employee policies referenced above in addressing any inappropriate comments or activities by employees online.

Personal blogs created by HSE employees, including microblogs like Twitter accounts, should have a clear disclaimer that the views expressed by the author in the blog are the author's alone and do not represent the views of their employer. Authors should write clearly and in the first person, to clarify that the views or comments are personal.

Social media activities should not interfere with your HSE work commitments, and employees should remind themselves of the HSE's ICT Acceptable Use Policy. HSE logos and trademarks may not be used without the prior written consent of the HSE.

**Remember, when using social media in personal time:**

1. All HSE employees are public servants. Our role and our work is to serve the public and ensure that health and personal social services are delivered to the best possible standards. Be respectful of all individuals, races, religions and cultures; how you conduct yourself in the online social media space not only reflects on you – it is a direct reflection on your professionalism, your clients and your employer.
2. Think before you post. Anything you post that is inaccurate, unfair, or breaking patient privacy standards will ultimately be your responsibility.
3. You may come across negative posts about the HSE, but should avoid responding yourself. The post in question should be forwarded to the Communications Department, whose staff are authorised to respond to comments on behalf of the HSE.
4. Be conscious when mixing your business and personal lives. Online, your personal and business profiles are likely to intersect. The HSE respects the privacy of all employees, but you must remember that clients and colleagues may have access to the online content you post. Keep this in mind when publishing information online that can be seen by more than friends and family, and know that information originally intended just for friends and family can be forwarded on very easily.
5. Know that the Internet is permanent. Once information is published online, it is essentially part of a permanent record, even if you "remove/delete" it later or attempt to make it anonymous.
6. Be aware of both compliments and criticism of the HSE. Even if you are not an official spokesperson for the HSE, you can be a vital asset in monitoring the social media landscape. If you come across positive or negative remarks about the HSE online that you believe are important, consider sharing them by forwarding them to [press@hse.ie](mailto:press@hse.ie).

### **3. Protecting Employees from online abuse**

Given the nature of and the high levels of participation in social media sites like Facebook in Ireland, HSE employees may from time to time become the victim of abuse or defamation by members of the public through comments made and published on the internet or on social networks.

Where this occurs, HSE local line management will work to support its employees in every way possible. Responsibility for responding to staff concerns about and co-ordinating the response to abusive online comments rests with local line management, as is does with all staff health safety and welfare issues.

Where staff are notified of or are concerned about an abusive or defamatory post, profile, comment or page relating to a HSE employee or service, this should be reported immediately to the senior line manager. The line manager should arrange for the post to be reviewed, and where possible or appropriate, the post should be reported as abuse with the relevant site's existing reporting process. A screenshot should be recorded of the comment.

HSE Communications is available to assist line managers in responding to cases such as this, by providing access to sites such as Facebook to allow for online reporting, and also by giving advice on how to approach website or network owners and publishers directly in relation to reporting abusive content. In cases of defamation, local line managers may where appropriate choose to seek legal advice, notify HSE Insurers and report to NIMT as a serious incident that may require further investigation and action by the organization.

**For more information on Digital and Social Media issues, please contact the National Communications Directorate Tel 01 635 2620 Email [digital@hse.ie](mailto:digital@hse.ie)**