

Social Media Policy

DOCUMENT CONTROL SHEET

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Change History:

Version	Date	Reviewer(s)	Revision Description
v1.0	April 2016	E. Maddock/N. Milbourn	Draft
V2.0	June 2018	E. Maddock/N. Milbourn	Update to include GDPR

Implementation Plan:

Development and Consultation	This policy has been developed by the communications and engagement team, following a review of the guidance and policies of various national professional bodies.
Dissemination	The policy will be made available on the CCG's website and promoted through appropriate communication channels to all staff and CCG representatives including staff induction.
Training	The policy will also be highlighted at future staff inductions to ensure new CCG staff are aware of their responsibilities.
Monitoring	The use of social media can be monitored by HBLICT as per the E-Mail and Internet Usage Policy
Review	2 years from approval date
Equality, Diversity and Privacy	18/06/2018 - Equality Impact Assessment (Appendix 4) 18/06/2018 - Privacy Impact Assessment (Appendix 5)
Associated Documents	Bullying & Harassment Policy Confidentiality Code of Conduct Disciplinary Policy and Procedure E-Mail and Internet Policy Guidance on the use of E-mail when sending Personal Confidential Data (PCD)

References	<p>NHS Employers - New to the NHS? Your guide to using social media http://www.nhsemployers.org/case-studies-and-resources/2014/11/new-to-the-nhs-your-guide-to-using-social-media</p> <p>RCGP - Social Media Highway Code http://www.rcgp.org.uk/social-media</p> <p>The Nursing and Midwifery Council - Social media guidance https://www.nmc.org.uk/standards/guidance/social-media-guidance/</p>
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1.0 Introduction

- 1.1 This policy provides guidance for employees on the use of social media. For the purposes of this policy, this should be understood to include blogs, message boards, chat rooms, electronic newsletters, online forums and social networking sites including, but not limited to, Facebook, Twitter, YouTube, Flickr, LinkedIn, Snapchat and WhatsApp and other sites and services that permit users to share information with others online.
- 1.2 Social media can be a powerful tool to support the CCGs work in communicating and engaging with partners, stakeholders and the wider public, as well as a useful mechanism for recruitment. However, if used inappropriately, social media could have a very negative effect on the CCG's reputation.
- 1.3 The principles set out in this policy apply to the professional use of social media on behalf of East and North Hertfordshire CCG (ENHCCG) as well as employee's personal use of social media when referencing or being identified as affiliated with ENHCCG.
- 1.4 This policy should be read in conjunction with the HBLICT e-mail and internet policy.
- 1.5 All information will be held in accordance with the General Data Protection Regulation (GDPR), Data Protection Act 2018, the Human Rights Act 1998 and the common law duty of confidentiality.

2.0 Scope

- 2.1 This policy applies to all CCG staff members, including Governing Body members, whether permanent, temporary or contracted-in (either as an individual or through a third party supplier), and members of GP Practices who act in a capacity as an official representative of the CCG.

3.0 Purpose

- 3.1 To ensure staff are aware of their responsibilities in relation to social media and the effect that social media can have on the CCG's reputation and working practices.
- 3.2 To give guidance to staff on how to best represent the organisation online, and the positive and effective way social media can help to promote the organisation's priorities.

4.0 Definitions

- 4.1 ENHCCG – East and North Hertfordshire Clinical Commissioning Group
- 4.2 HBLICT – Hertfordshire, Bedfordshire and Luton Information Communications Technology
- 4.3 Blogs – personal website journals
- 4.4 Online forums – instant messaging and chat websites
- 4.5 Social Networking Sites – for example Facebook, Twitter, LinkedIn etc.

5.0 Roles and Responsibilities

- 5.1 Committees with specific responsibilities:
Information Governance Forum – for sign off of policy and procedure
- 5.2 Executive roles with specific responsibilities:
Chief Executive – Accountable Officer
Chief Finance Officer – as Information Governance Forum Chair
- 5.3 Other roles with specific responsibilities
Assistant Director for Communications – organisational lead for communication and application of the policy
Line Managers – to ensure staff are aware of the policy, its principles and adherence of the policy
All staff – to follow the policy

The policy will be included in staff induction by the Assistant Director for Communications or their representative. For further advice and guidance on the use of social media, please contact a member of the communications team.

6.0 Policy Procedures

- 6.1 Employees need to know and adhere to all relevant CCG policies when using social media, for example the email and internet policy and bullying and harassment policy. They should also be mindful of the CCG's disciplinary policy and procedure, which prohibits any actions which bring the organisation into serious disrepute.
- 6.2 Employees should be aware of the effect their actions may have on their own reputation as well as the CCG's reputation. The information that employees post or publish online can be accessed around the world within seconds and is not easy to delete or withdraw once published.
- 6.3 Employees should be aware that ENHCCG may observe content and information made available by employees through social media. Employees should use their best judgement and only post material that is neither inappropriate nor harmful to the reputation of the CCG, its employees, members or wider NHS.
- 6.4 Although not an exclusive list, some specific examples of prohibited social media conduct include:
- criticising or arguing with colleagues online where there is reference to the CCG, or that could be categorised as bullying or harassment
 - making defamatory comments about individuals (whether employees, patients or organisations);
 - posting images that are inappropriate or link to inappropriate content, using either text, imagery or video material, including images of the workplace and NHS logos.
- 6.5 Employees must not publish, post or release any information that is considered confidential or not for public knowledge. Such unauthorised disclosure of confidential information includes:
- revealing information owned by the CCG;
 - giving away confidential information about an individual (such as a colleague or patient), or organisation
 - discussing the organisation's internal workings (such as particular working relations with organisations or colleagues, or future business plans that have not yet been communicated to the public);
 - the posting of photos that contain visible screens in the background which may contain sensitive information about individuals etc.

If there are questions about what is considered confidential, employees should check with the communications team or HR department.

- 6.6 Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Employees should refer these inquiries to the CCG communications team.
- 6.7 If employees encounter a situation while using social media that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner and seek the advice of a supervisor.
- 6.8 Employees should get appropriate permission before referring to or posting images of current or former employees, member practices, patients or the public. Additionally, employees should get appropriate permission to use a third party's copyrights, copyrighted material, trademarks, service marks or other intellectual property.
- 6.9 Social media use should not interfere with employees' day to day work and responsibilities. The use of social media networks or personal blogging of online content is permitted within reason, but please refer to the e-mail and internet policy for further advice on this.
- 6.10 Internet usage is monitored in accordance with the e-mail and internet policy and any excessive and/or inappropriate usage will be investigated. This may result in access to the service being withdrawn and disciplinary action taken.
- 6.11 It is highly recommended that employees keep ENHCCG related social media accounts separate from personal accounts.
- 6.12 Personal online activity that violates the CCG's policies could result in disciplinary action.
- 6.13 If employees publish content via personal social media accounts that involves work, colleagues or subjects associated with the CCG, a disclaimer should be used, such as this: "The postings on this site are my own and do not represent East and North Hertfordshire CCG's position, strategies or policies." However, the use of a disclaimer does not shield an employee from disciplinary action if the opinion or information posted is judged to bring the organisation into disrepute.
- 6.14 Defamatory statements about the CCG or its partners will be treated as a disciplinary offence and handled in accordance with the CCG's disciplinary policy.

The meanings of defamation are all related to the effect that the communication has upon its subject by way of the effect it has upon society or the community generally; it can be considered defamation in the following cases:

- it is a discredit to the person
 - it causes the regard in which the subject is held by others to be lowered
 - it causes the person to be shunned or avoided
 - it causes the person to be the subject of hatred, ridicule or contempt
- 6.15 All access (business and personal) to social networking systems using CCG equipment is logged and stored electronically for forensic investigation purposes.
- 6.16 CCG staff and member practices are advised to use the appropriate professional body's guidance when setting up and using social media, as referenced in Appendix 2.

Appendix 1

Staff guidance on setting up and using social media in accordance with this policy

Background

The East and North Hertfordshire CCG (ENHCCG) communications team is developing our corporate use of social media, with a particular focus on Twitter. We would like to encourage staff and GP leads to also use this social media platform. This guidance note outlines an approach to this activity.

Purpose of Twitter involvement

ENHCCG is increasing its engagement in this particular social media platform for a number of reasons:

- to raise the profile of the CCG amongst the local population, increasing awareness of the role of the CCG in planning, organising and monitoring local health services
- to pass useful information to the public about health services and health messaging generally
- to relate urgent or emergency messages relating to the availability of health services or to support business continuity
- to extend knowledge and understanding of ENHCCG objectives
- to broaden and deepen our conversation with local people and other stakeholders around services and service change - including eliciting and using feedback from patients, and as part of consultation exercises
- to extend our influence
- to assist with recruitment
- to assist in reputation management.

Twitter is used to amplify our messages and help us have conversations with a wide audience, including those who tend not to engage with us routinely, such as those in the younger age group, as well as high-profile public figures and representative bodies.

Extending our use of Twitter is our current focus but the communications and engagement teams will also continue to make use of our Facebook page. We are exploring other social media platforms, such as our recent use of YouTube.

Our approach to Twitter

The communications team runs the corporate ENHCCG Twitter account: @ENHertsCCG on a daily basis. In addition, any staff and clinical leads who wish to can establish individual accounts to support our presence on Twitter, increasing our spheres of influence and generating further opportunities for engagement.

Staff individual Twitter accounts will differ from the corporate account, as they will be more personal and dynamic, reflecting the interests and views of the individual Tweeter, whilst supporting CCG objectives. Staff Tweepers will add colour to our online presence, but all content is expected to support EN Herts CCG corporate key messages.

Guidance

- Users profile to include the words 'views are my own' or similar.
- Tweepers running accounts that are primarily dealing with NHS, health or EN Herts CCG issues, can generate interest and be appropriate to a dynamic and human communication method, Tweepers may also Tweet content that is more related to themselves as individuals.
- Set privacy settings in line with ICO guidance – see Appendix 2
- Tweepers can express their own views about policy issues in general, subject to restrictions - see below.
- Content will be: respectful; in line with our NHS values; non-party political; and not contain anything which would bring EN Herts CCG or the NHS into disrepute. When expressing opinions about particularly sensitive issues, Tweepers are asked to liaise with colleagues, in particular members of the communications team, for further guidance.
- Tweepers are encouraged to use images and videos as relevant and as appropriate
- Tweepers are encouraged to reference @ENHertsCCG as appropriate
- Tweepers will be expected to ensure that time spent on twitter activity is in proportion fits in with other aspects of people's roles; when necessary this will be discussed with managers.

Following and re-tweeting

- Twitter users are encouraged to re-tweet content from @ENHertsCCG as appropriate
- Twitter users are encouraged to follow - and re-tweet – stakeholder and partner tweets which are appropriate, relevant and will not bring the organisation into disrepute. Twitter users can also choose their own accounts to follow, subject to the restrictions as above. If a Tweeter is uncertain about the appropriateness of following a particular account, then seek advice from the comms team.

Tweeting topics

Tweepers are invited to be chatty in their posts, rather than corporate or bureaucratic. Examples of possible content in individual Twitter accounts:

- news about a new public event
- reporting from a CCG or partner event
- comment on and link to article in national or trade media
- comment on recent national or regional announcements
- good news from the Tweeters team
- messages about public health issues and campaigns
- messages about particular health conditions, such as diabetes
- comments about personal issues - e.g. participating in a charity event; weekend activities and hobbies - bearing in mind the restrictions as above.
- observation about use of a particular health service - in a measured and respectful way
- requests for views - bearing in mind that this needs to be tailored to a particular objective and reason for asking.

Tweeters will be expected to ensure that time spent on Twitter activity is in proportion fits in with other aspects of people's roles.

Appendix 2

Links and details of appropriate professional body guidance and policies on use of social media

- NHS Employers - New to the NHS? Your guide to using social media
<http://www.nhsemployers.org/case-studies-and-resources/2014/11/new-to-the-nhs-your-guide-to-using-social-media>
- RCGP - Social Media Highway Code
<http://www.rcgp.org.uk/social-media>
- The Nursing and Midwifery Council - Social media guidance
<https://www.nmc.org.uk/standards/guidance/social-media-guidance/>
- Social media privacy settings
<https://ico.org.uk/your-data-matters/online/social-media-privacy-settings/>

Appendix 3

List of relevant CCG policies

Policies can be found at <http://www.enhertsccg.nhs.uk/policies>

Bullying & Harassment Policy

Confidentiality Code of Conduct

Disciplinary Policy and Procedure

E-Mail and Internet Policy

Guidance on the use of E-mail when sending Personal Confidential Data (PCD)

Appendix 4

Equality Analysis - Equality Impact Assessment Screening Form

Name of policy / service	Social Media Policy
What is it that is being proposed?	Revisions to the existing CCG Social Media Policy in line with legislative and/or administrative changes
What are the intended outcome(s) of the proposal	The Policy to be ratified and adopted by the CCG
Explain why you think a full Equality Impact Assessment is not needed	The policy is designed to guide CCG staff who use social media. The use of social media by CCG staff is entirely voluntary and their ability to use social media is not affected by any protected characteristics which they may or may not have.
On what evidence/information have you based your decision?	N/a
How will you monitor the impact of policy or service?	Social Media usage is monitored regularly by members of the communications team
How will you report your findings?	Social media usage is reported weekly in communications news round-up and annual report.

Having considered the proposal and sufficient evidence to reach a reasonable decision on actual and/or likely current and/or future impact I have decided that a full Equality Impact Assessment is not required.

Assessors Name and Job title	Nuala Milbourn, Associate Director Communications; Ewan Maddock, Digital Communications Officer
Date	18/06/2018

Appendix 5

Privacy Impact Assessment Stage 1 Screening

1. Policy		PIA Completion Details	
Title: Social Media Policy <input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing Date of Completion: 18/16/2018 Review Date: 18/06/2020		Nuala Milbourn, Associate Director Communications; Ewan Maddock, Digital Communications Officer; r	
2. Details of the Policy. Who is likely to be affected by this policy?			
<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Patients <input type="checkbox"/> Public			
	Yes	No	Please explain your answers
Technology Does the policy apply new or additional information technologies that have the potential for privacy intrusion? <i>(Example: use of smartcards)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Identity By adhering to the policy content does it involve the use or re-use of existing identifiers, intrusive identification or authentication? <i>(Example: digital signatures, presentation of identity documents, biometrics etc.)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
By adhering to the policy content is there a risk of denying anonymity and de-identification or converting previously anonymous or de-identified data into identifiable formats?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Multiple Organisations Does the policy affect multiple organisations? <i>(Example: joint working initiatives with other government departments or private sector organisations)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Data By adhering to the policy is there likelihood that the data handling processes are changed? <i>(Example: this would include a more intensive processing of data than that which was originally expected)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If Yes to any of the above have the risks been assessed, can they be evidenced, has the policy content and its implications been understood and approved by the department?			

Assessments Completed by	
Name:	Ewan Maddock,
Position:	Digital Communications Officer
Date:	18/06/2018

Assessment to be reviewed by Head of Information.

Head of Information name:

Date:

Comments:

Assessment to be reviewed by SIRO or Caldicott Guardian.

Name:

Role:

Date:

Comments: