

Policy Title: Social Media Policy

Policy Number: SWLCCG/CE01

	Name	Role and Organisation	Date
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Authoriser		SWL CCGs Senior Management Team	March 2020

Approved By	SWL SMT
Applies To	South West London CCG (SWL CCG) and its employees, Governing Body Members, Committee Members and all staff working for, or on behalf of, NHS South West London CCG, including those employed on permanent or fixed term contracts, interims, self-employed contractors, Clinical Leads, Locality Leads, and volunteers.

Effective Date	01/04/2020
Review Date	30/03/2021

Controlled Document

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Target Audience	Governing Body Members, Committee Members and all staff working for, or on behalf of, NHS South West London.
Brief Description	<p>This Policy sets out the principles by which we will:</p> <ul style="list-style-type: none"> • Establish the framework with which we plan and carry out day to day and campaign led social media communications and conduct • Determine the process through which we raise, address and account for any communications via social platforms that breach the guidelines set out by the CCG and relevant social media platforms • Determine how we will evolve this policy to reflect changes in social media activity and changes to platform terms of service.
Action Required	Ensure that this Policy is shared via the Daily Update, at Team Meetings and included on the SWL Intranet.

Contents

1. Introduction	3
1.1 Introduction.....	3
1.2 Policy Statement.....	3
1.3 Legal, Statutory, Mandatory, and Best Practice Requirements	3
2. Scope.....	4
3. Definitions.....	4
4. Responsibilities	4
4.1. All Staff	4
4.2. All Line Managers.....	4
4.3. Senior Responsible Officer	4
5. Acceptable use of Social Media	4
5.1. Respect safeguarding issues	5
5.2. Adhere to policies and procedures.....	5
5.3. Official social media accounts.....	5
5.4. Communicate as yourself	6
5.5. Be respectful of others	6
5.6. Ensure comments are factually and legally sound	6
5.7. Don't bring yourself or your employer into disrepute	6
5.8. Use of copyrighted materials.....	6
5.9. Use of photos	6
6. Incident response process.....	7
6.1. Incident awareness.....	7
6.2. Incident response	7
6.3. Disciplinary and policy review	7
7. Review	7
8. Templates/Forms	7
9. Internal and External References	7
10. Monitoring.....	8
11. Equality Impact Assessment.....	8
12. Change History	8
13. Appendix 1 - Equality Impact Assessment	9

1. Introduction

1.1 Introduction

For the purpose of this policy, 'Social media' refers to internet-based platforms and tools that allow people to share information about themselves or others, be it text, video, audio, photos and documents.

For South West London CCG staff and contractors, use of social media extends to the following three aspects;

- Individuals using internal-facing messaging platforms, like Slack, Skype, WhatsApp etc
- Individuals using public-facing social media, e.g., Twitter, Facebook, Instagram, WhatsApp etc, as a representative of South West London CCG
- Individuals using public-facing social media as a private individual

Whether an individual is using social media from their own personal account or from an official CCG or Partner account, it is important to ensure that their communications respect the boundaries of colleagues, public figures and other members of the public, and that their communications should;

- Avoid damaging the reputations of the CCG and its partner organisations
- Make clear that their views do not represent the views of those organisations
- Avoid using social media in a way that breaches their employers' policies, in such a way that could affect their employment

Individuals must also remember that commenting on social media will be seen by colleagues, patients, clinicians and the wider world, and that their comments can then be shared widely on other social platforms, possibly in a different context to the one they intended.

1.2 Policy Statement

To help those individuals included in the scope of this policy to understand their responsibilities when using social media and the legal implications involved; and to illustrate where problems can arise for individuals or the organisations they represent:

1. South West London Health and Care Partnership
2. South West London CCG
3. NEL CSU (working on behalf of the organisations named above)

The policy sets out an individual's responsibilities when using social media and the legal implications involved. It is not intended to stop individuals from using social media sites in their own time, but to outline some areas of best practice and illustrate where problems can arise for individuals and the organisations they work for.

1.3 Legal, Statutory, Mandatory, and Best Practice Requirements

Individuals must ensure that their posts do not constitute defamatory or false statements, as determined by the [Defamation Act 2013](#), or could be considered an incitement to crime or hatred, as detailed in the [Public Order Act 1986](#).

Best practices refer to the guidelines set out by the CCG in this document, and those set out by the social media platforms. For more on best practices, please refer to [Acceptable Use](#) below.

2. Scope

This policy applies to all staff who are directly employed by South West London CCG). It also applies to any agency workers, students and volunteers whilst on placement. This Policy applies to all individuals working for, or on behalf of NHS South West London CCG including those employed on permanent or fixed term contracts, interims, self-employed contractors, Governing Body Members, Clinical Leads, Locality Leads, and volunteers.

3. Definitions

'Legally sound', means all comments are seen to be factually accurate and do not endorse or promote discrimination or hatred on grounds of race, gender, sexuality, religious practice and beliefs. All comments should not constitute a false or malicious statement, and do not seek to lower the reputation of another person or company in the eyes of others. As such all comments are subject to laws on defamation, libel and slander, as well as wilful or unwitting dissemination of any of the above.

4. Responsibilities

All those covered by this Policy have a responsibility to follow the principles set out within it. Individuals should ensure that they know their CCG's policies and follow them at all times.

Registered Healthcare Professionals should be aware of, and adhere to, the standards and guidelines published by their relevant registering authority and are advised that they may put their registration at risk if they post inappropriate information on social networking sites.

The General Medical Council (GMC) has its own guidance on Doctors' use of social media, including the benefits and risks to consider when using social media platforms for patient care or discussing patients and their care, as well as offering advice on how Doctors can put these principles into practice. These principles can be transferred across to other roles. This guidance can be found here: <https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/doctors-use-of-social-media>

4.1. All Staff

All individuals working for, or on behalf of the organisation(s) listed within 1.4 Scope, including those employed on permanent or fixed term contracts, interims, self-employed contractors, Governing Body Members, Clinical Leads, Locality Leads, and volunteers are responsible for complying with this Policy.

4.2. All Line Managers

Line Managers are responsible for ensuring that they make their teams aware of this Policy.

4.3. Senior Responsible Officer

The Director of Communications and Engagement is accountable for this policy, and for supporting the implementation thereof.

5. Acceptable use of Social Media

Social media can blur the boundaries between a person's private and professional lives. Individuals who use social media in their personal and professional life should therefore be mindful that inappropriate use, even if it does not mention their employer, could damage their own reputation and therefore be of concern to the organisation they work for.

Individuals should ensure that their posted statements adhere to the terms of service laid out by the platform in question, and that they meet the legal requirements laid out by the [Defamation Act 2013](#)

and the [Public Order Act 1986](#). For example, individuals should not make false, misleading or defamatory statements, and must not promote hate or discrimination against any group or individual on the grounds of race, religious belief, gender or sexuality.

When individuals publish something on social media, they acknowledge that it is in the public domain. They should be aware of privacy limitations when posting material. Even if something is initially shared with a limited group of followers or friends, it could still be copied and shared or published elsewhere. Moreover, any member of the public could take the content of that post (by 'screen grabbing') and manipulate that content to suit or serve a different message.

Individuals should carefully consider what they want to say before they publish, and work on the basis that anything they write or post could be shared (or in extreme cases, co-opted) more widely without their knowledge or permission.

Individuals should make obvious in the biography section of their public profile that a) any views expressed by them are not representative of any employer and b) any post they 'share', by either retweeting, liking or any other means of sharing, does not constitute an endorsement of the post they are sharing.

Individuals should configure their privacy settings and review them regularly. Guidance is available from the communications and engagement team if any member of staff is concerned about the privacy settings on any social platforms they use.

When using any social media platform, individuals should follow the principles outlined below:

5.1. Respect safeguarding issues

Posts made by individuals must not encourage or endorse behaviour that could be linked to safeguarding issues, for example:

- Incitement of discrimination or hatred
- Bullying
- Luring and exploitation
- Theft of personal information
- Encouraging self-harm or violence
- Glorifying activities such as excessive drinking or drug-taking

5.2. Adhere to policies and procedures

Individuals using social networking sites should always adhere to the codes of conduct and policies which are part of their professional and employment requirements. These include:

- Professional code of conduct (e.g. Health & Care Professions Council)
- Guidance on social media (Health & Care Professions Council)
- Other codes of conduct (e.g. confidentiality clause in your contract)
- Relevant CCG policies

Individuals must ensure that their conduct on any social platform adheres to the platform's rules of conduct

5.3. Official social media accounts

All official social media sites are managed by the communications and engagement team. The communications and engagement team may occasionally endorse other official Twitter accounts to be run by trained staff.

No other teams/individuals should set up corporate sites without the authorisation of the communications and engagement team or set up sites that are made to resemble an official site.

5.4. Communicate as yourself

Individuals who list their work capacity in their social media biography are expected to post under their real name. If an individual post under a pseudonym and at a later stage these posts are associated with their real name, all previous posts will be admissible in any investigatory process.

5.5. Be respectful of others

Individuals must not post anything that is disparaging about a group or individual on social media; for example, their lifestyle, culture or their social or economic status, as well as the characteristics protected by law – age, disability, gender reassignment, race marriage and civil partnership, pregnancy and maternity, religion or belief, sex and sexual orientation.

Individuals should seek permission before posting personal details of colleagues, managers or patients. In particular, permission for any contribution from a member of the public or a patient should be sought in writing using our standard consent form. In addition, permission should be sought to 'tag' any colleague, patient or member of the public in any post (i.e. dynamically link within that post to the featured colleague's own social media profile). Individuals must always remove information about a contributor if they have been asked to do so.

Individuals should be careful when sharing or retweeting posts, as they could be seen to be endorsing someone else's point of view.

5.6. Ensure comments are factually and legally sound

When posting information, individuals must ensure it is factually correct. If they discover they have reported something incorrectly, they should amend it and make it clear they have done so.

All comments must be legally sound, must not constitute a breach of the Defamation Act 2013 or the Public Order Act 1986 and must not be factually inaccurate or defamatory, or incite people to act illegally or present negative behaviours. Individuals could face legal proceedings for posted comments aimed at individuals, named or unnamed, or an organisation that are considered to harm reputation, or that endorse or incite discrimination or hatred against others.

5.7. Don't bring yourself or your employer into disrepute

Individuals should not air grievances or publish anything that risks bringing their organisation or any partner organisations into disrepute.

Individuals should only share information about the organisation they work within if it is already in the public domain or they have been given approval to share it and should refrain from making derogatory comments on these issues.

5.8. Use of copyrighted materials

Individuals should not include materials in their posts that are copyrighted. Breaching copyright restrictions on photos and other materials can bring organisations into disrepute and even legal action.

5.9. Use of photos

Individuals should think carefully before posting photos that relate to their work / role. If individuals post any photos of themselves, colleagues, members of the public or patients in an identifiable work

setting, they must ensure that these represent a professional image and that permission has been granted (by obtaining a signed version of our standard consent form) by all individuals featured.

Individuals must not post images containing patient information on personal social media accounts that could identify the patient or lead the patient to identify themselves.

6. Incident response process

6.1. Incident awareness

Concerns about possible misconduct on social platforms should be conveyed to the Director of Communications and Engagement and the Communications lead.

6.2. Incident response

The Communications team will take steps to ensure that any offending social media communications have been escalated to the Director of Communications and Engagement, and where necessary, to the social platform's own moderation services. They will then determine whether these communications need to be corrected, deleted or both, with an appropriate acknowledgement as to what the communication was and why it has been removed.

The Director of Communication & Engagement and the Communication Lead will raise the incident with the individual's line manager or other relevant manager for investigation and to determine the appropriate action.

Where an individual is found to have used social media sites inappropriately, as outlined in the principles above, they may be subject to disciplinary action which will be managed by HR Transition Lead, Maureen French. For those registered with professional bodies, including clinicians, a decision will be made as to whether the incident should be referred to the professional body.

6.3. Disciplinary and policy review

The Director of Communications & Engagement and the Communication Lead will review this policy and consider if any amendments are required following the incident.

7. Review

All new policies will be reviewed after one year initially, and every three years thereafter, though updates will be made beforehand as and when significant changes to practice and platform rules are required.

8. Templates/Forms

Any templates required for the implementation of this policy will be stored centrally on SharePoint.

9. Internal and External References

9.1. Internal References

Any internal references to other relevant Strategies, Frameworks, Policies, SOPs, or organisational documents will be listed here.

9.2. External References

Any external references to documents or publications as required will be listed here, using the conventions described within SOP 2 – Writing and Managing Corporate Documents.

10. Monitoring

This policy will be monitored annually or following an instance of an individual failing to meet its requirements.

If you have any suggestions for the improvement of this Policy, please contact the Social Media and Campaigns Manager with your suggestions.

11. Equality Impact Assessment

An Equality Impact Assessment has been carried out for this policy and reflected in Appendix 1. South West London CCG will continue to assess activities, and to set out how they will monitor any possible negative impact upon equality in terms of the protected characteristics of age, disability, gender, gender identity, marriage or civil partnership, pregnancy and maternity or paternity, race, religion or belief, and sexual orientation. If a negative impact is identified South West London will take action to reduce that impact.

12. Change History

Policy Number	Effective Date	Significant Changes
C&E01.0	01/04/2020	

13. Appendix 1 - Equality Impact Assessment

	Mandatory Questions	Yes/No/NA	Comments
1.	Does the Policy affect any group less or more favourably than another on the basis of:		
	Age?	No	
	Disability?	No	
	Gender?	No	
	Gender identity?	No	
	Marriage or civil partnership?	No	
	Pregnancy and maternity or paternity?	No	
	Race?	No	
	Religion or belief?	No	
	Sexual orientation?	No	
2.	Is there any evidence that any groups are affected differently by the Policy and if so, what is the evidence?	No	
3.	Is any impact of the Policy likely to be negative?	No	
4.	If any impact of the Policy is likely to be negative, can the impact be avoided and if so, how?	NA	
5.	If a negative impact can't be avoided, what, if any, are the reasons the Policy should continue in its current form?	NA	
6.	Where relevant, does the Policy support the FREDA principles: Fairness, Respect, Equality, Dignity and Autonomy?	Yes	

If you have identified a potential discriminatory impact of this Policy, please contact the Chief of Staff.