NHS Dumfries & Galloway

Staff Use of Social Media Policy

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1.   PURPOSE AND SCOPE

NHS Dumfries and Galloway is committed to improving how it communicates with the public, staff and other stakeholders. This includes using all reasonable and cost-effective means to reach out to the different communities we serve.

Social media is the term normally given to web-based tools which allow users to interact with each other in some way. This could be by sharing information, opinions, knowledge and interests online.

Social media involves the building of online communities or networks. This includes:

- Blogs
- Message boards
- Social networking websites such as Facebook and Twitter
- Content sharing websites such as Flikr and YouTube
- Many other similar online channels

The way such information is consumed is also changing with the increased use of mobile devices such as Blackberries, iPhones and similar hardware. It is therefore important that we all understand how social media tools can help NHS Dumfries and Galloway achieve its business objectives in a professional and responsible fashion and that staff are empowered to contribute effectively to this collaborative activity when it supports our roles within the organisation.

Social media platforms open up new and exciting opportunities. However, NHS Dumfries and Galloway is only just getting to grips with such technology and there are many issues to consider, both as individual employees and as an organisation. To avoid major mistakes it is important to manage potential risks through a common-sense approach and framework. We need to pro-actively monitor the development of such applications.

As NHS staff we need to remember that what is written on social media sites is public and ensure that, while posts and blogs are personal to us, they are not upsetting, derogatory or offensive. Posts and blogs should respect the same boundaries of confidentiality to patients and colleagues that apply in the workplace.

There is potential for staff to post comment which could be viewed as inappropriate or offensive to colleagues, patients or their families. If comments like this come to the attention of managers a view will be taken as to whether the comments require to investigated under the Boards Conduct Policy due to the nature of those comments. Where the Conduct Policy is not required, the member of staff may be asked to remove the post and reminded of the standards of behaviour expected by NHS Dumfries and Galloway.

It is also possible for social media posts to break the law and staff should remember that both internal Conduct procedures and criminal procedures may be instigated if posts fall into one of the four following categories:

- Communications which specifically target an individual or group of individuals in particular communications which are considered to be hate crime, domestic abuse, or stalking.

- Communications which may constitute credible threats of violence to the person, damage to property or to incite public disorder

- Communications which may amount to a breach of a court order or contravene legislation making it a criminal offence to release or publish information relating to proceedings.

- Communications which do not fall into any of the previous categories but are nonetheless considered to be grossly offensive, indecent or obscene or involve the communication of false information about an individual or group of individuals which results in adverse consequences for that individual or group of individuals.

2.   POLICY AIMS

This policy sets out the standard that should be followed by all NHS Dumfries and Galloway staff when publishing content to any social media networks through an account approved for use for work related subjects. The policy covers the use of social media and networking sites, established and managed by staff on behalf of NHS Dumfries and Galloway. The policy covers the publication of posts and submissions either in the form of the written word, photograph, video or any other medium to a publicly or privately available social media site approved for use for work related subjects. This includes but is not limited to:

- Externally managed and hosted social media sites such as Facebook, Google+ and LinkedIn.
- Externally managed blogs/microblogs tools such as Twitter, WordPress and Blogger.com.
- Externally managed discussion boards such as Patient Opinion.
- Internally managed blogs, discussion boards or other OSN medium managed within the confines of the NHS Dumfries and Galloway intranet.

When someone clearly identifies their association with NHS Dumfries and Galloway and / or discusses their work online, they are expected to behave appropriately and in ways which are consistent with our policies and procedures.

The Internet is a fast moving technology and it is impossible to cover all circumstances. However, the principles set out in this document should always be followed and be read together, as appropriate, with other policies and legislation, including:

- Data Protection Act 1998
- Equalities Act 2010

- Plain English guide
- Conduct Policy
- IT Security Policy
- Email and Internet use
- Network access procedure

To this end, when you are identified as a staff member (whether through displaying an NHS email address or by identifying the organisation) you should not:

- Engage in activities on the Internet which might bring NHS Dumfries and Galloway into disrepute
- Post information regarding patients and / or relatives
- Disclose commercially sensitive or privacy marked information
- Infringe copyright rules
- Attack or abuse colleagues
- Post derogatory or offensive comments

Staff should understand that if they do engage in one or more of the above activities, then decisions may be taken to manage the activity under the Conduct Policy.

3. RESPONSIBILITIES AND ORGANISATIONAL ARRANGEMENTS

Social media is just another communications tool. It is not something to use just because you can, but needs to be the most appropriate tool for the job.

Evaluation criteria for using social media as a communications tool will include:

- What are the objectives of the campaign?
- What audience are you targeting and is the method right for them?
- Why use social media as opposed to other communications channels?
- Is an existing communication channel a better option?
- How would your chosen site / tool fulfil your objectives?
- Are others in the organisation doing something similar?
- How will the success be measured?
- What are the potential risks and have they been addressed?
- Are the resources in place to keep the channel/network up to date and / or to moderate any discussion forums?
- Who will be responsible for managing / moderating the channel?
- Has training been arranged for staff involved?
- The use of common channels is encouraged – for example, NHS Dumfries and Galloway has its own You Tube channel and this should contain all NHS Dumfries and Galloway related video.

NHS Dumfries and Galloway is committed to the setting up of, supporting of and the promotion of social media sites, public blogs, discussion boards, microblogs and internal blogs which inform, connect and collaborate with other people or organisations provided they add value to the Board and adhere to this policy.

While using social media there are several different roles and responsibilities for you to consider. Sometimes these roles may be combined but more often you will be acting in a distinct capacity. Below are the types of role you may be asked to undertake and some common-sense guidance to help you fulfil each role.

> **Individual contributor/participant on a personal basis**

Whether or not an individual chooses to create or participate in an online social network or any other form of online publishing or discussion is his or her own business. The views and opinions you express are your own.

As an employee of NHS Dumfries and Galloway it is important to be aware that posting information or views about the organisation cannot be isolated from your working life. Any information published online can, if unprotected, be accessed around the world within seconds and will be available for all to see and will contribute to your digital footprint [1].

- Remember 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 information.
- All employees must be aware of and follow the NHS Dumfries and Galloway's Standards of Business Conduct which can be found on Hippo**.**
- All employees should be aware of and follow the Information Security Policy which can be found on Hippo
- If you do talk about the work you do or an NHS Dumfries and Galloway service you are associated with, you should make it clear that you are speaking for yourself and not on behalf of your employer. Use a disclaimer such as: "*The views expressed here are my own and do not necessarily represent the views of NHS Dumfries and Galloway.*"
- Do not let your use of social media interfere with your ability to manage your work load.

[1] A **digital footprint** is the data trace or trail left by someone's activity in a digital environment. Digital footprints are the capture in an electronic fashion of memories and moments and are built from the interaction with the internet through mobile, web and other digital devices.

> **Individual contributor/participant on a professional basis**

As an employee, you must take the following into consideration when using social media:

- You are personally responsible for any content you publish. Be mindful that it is in the public domain and on the record for a long time.
- If you wish to take part as an NHS Dumfries and Galloway employee you should clearly identify yourself and your role. Make it clear whether you are acting in your professional capacity. Even if you do not intend to, your professional role or status as a public sector employee will affect the way you and the organisation are perceived. This brings certain responsibilities.

- Be aware of your association with your employer in online spaces.
- If you identify yourself as an NHS Dumfries and Galloway employee, ensure your profile and related content is consistent with how you wish to present yourself with colleagues and the wider public.
- Be professional. Make sure you are always seen to act in an honest, accurate, fair and responsible way at all times.
- Be aware of your language and conduct. The rules governing staff conduct such Equality and Diversity policies still apply.
- Also, as in all publishing, you should be aware of issues such as libel, defamation and slander.
- It is accepted that the style of the language may vary depending on the audience.
- Never share confidential or sensitive information. You should know and follow the NHS Dumfries and Galloway Information Security Policy. You have a unique inside track so be aware of the rules on data protection.
- Try to add value. Provide worthwhile information and perspective. An organisation's brand is best represented by its people and what you publish will reflect on the wider organisation.
- Tell your line manager. If you wish to participate in a professional capacity discuss with your line manager first. However, you won't need to complete the template before participating. Always alert your manager or the Communications Team early if you think you may have made a mistake.
- Assess any risks. Think through any potential risks and make sure you have plans in place to manage and mitigate these.
- When the channel involves engaging with young people, the staff involved must go through the Disclosure Scotland process.
- Respect your target audience. Think about their specific needs and be aware of any language, cultural or other sensitivities you may need to take account of.
- Ask and seek permission to publish any information, report or conversation that is not already in the public domain. Do not cite or reference customers, partners or suppliers without their approval.
- Respect copyright when linking to images or other online material.
- The NHS Dumfries and Galloway corporate logo needs to be consistently and correctly applied and must not be altered or modified in any way. The Corporate Communications Team can provide digital copies of the logo and advice on appropriate use.
- Always stay within the legal framework and be aware that freedom of information, data protection, financial and other regulations apply.
- Make sure you have a plan for how you intend to monitor and evaluate the success of your activity.

> **Broadcaster/publisher**

Your role is to simply provide or promote some form of information to an audience. To do this effectively you must be accurate, fair, thorough and clear in the information you provide. The rules of Accessibility and Plain English should apply.

It is also a common oversight to forget to ensure that if you provide information or generate awareness through broadcast you must also provide a method or route for people to find out more or enquire about the information provided. If this is you make sure that you are set-up to manage this response. If it is someone else then ensure that they are aware that this is the case and they understand the information you have broadcast.

> ➢ **Line manager roles and responsibilities:**

Line managers are asked to take an active role in any social media programme of work and work with colleagues to ensure quality of content is in keeping NHS Dumfries and Galloway values, behaviours, expectations and managers' standards.

Guidance and Tips:

- You must have buy-in from the organisation
- Make the commitment to maintaining the accuracy and updating of this information
- Ensure that there is a clear and resourced 'return path' for people to enquire or respond to your information. For example, when sending out information about an outside organisation like LGBT Scotland, you should include their email, phone number and web address.
- Understand the restrictions of your chosen tool. For example Twitter restricts you to 140 characters; if you wish people to retweet your information allow space for this to occur.
- Use group or generic email addresses whenever possible rather than individual email addresses
- Managers must keep copies of passwords so that the sites can be accessed easily by the service.
- Please read the Guide to Personal Use of Social Media (Appendix 1) and the Guide to Services Use of Social Media (Appendix 2)

> ➢ **Moderator**

The primary role of a forum moderator should be to promote interaction. A forum moderator should be posting new threads and adding new content to the site. They should be helping out members with their queries and they should be keeping threads alive by asking questions. That is not to say that forum moderators shouldn't be allowed to delete or lock threads that are inappropriate – of course this should be one of their roles. But this should not be their primary role.

Moderator is one of the most important and difficult roles to undertake. You should not underestimate the time needed to encourage, grow and create valuable online discussion or communities. Moderators are not police officers

The biggest mistake owners of social media platforms make when appointing forum moderators is expecting them to police the community. Many see the main role of moderators as enforcers of the site rules, as people who delete posts they don't like

and lock topics the moment they run off-course. If these are the priorities of your moderators, you are doing it all wrong.

➢ **Forum Administrator**

The **Forum Administrator** may fulfil some of the advanced roles of the Moderator. However it might be better to separate the facilitation and moderation of the content of the site from the administration of the forum.

Administrative tasks would include the channel being up to date, technical issues, adding or deleting accounts, routing general enquiries and maintaining its technical/functional integrity.

Neither Moderator nor Facilitator is an administrative role as both are responsible for the content and its integrity on the site or channel. Both are more evolved roles.

## 4.	MONITORING

You must get permission from your General Manager or Director to use social media as part of your work. The Communications Team is also available to offer support and advice.

Getting the best from such tools means you have to understand the commitment and investment of time in building and developing sustainable online relationships. Managers should take into account whether those resources are available and whether a particular tool is the best one for the job. Departments should consider which level of management will make this decision.

## 5.	EQUALITY AND DIVERSITY

When using social media, consideration must be given to the Equality Act 2010 Public Sector Equality Duty (PSED) in relation to the nine protected characteristics of Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion and Belief, Sex and Sexual Orientation. The PSED requires NHS Dumfries and Galloway to pay due regard to the following aims in relation to the nine protected characteristics:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between those who share a protected characteristic and those who do not
- Foster good relations between those who share a protected characteristic and those who do not.

Any member of staff who is using social media inappropriately, and/or who is displaying behaviours which amount discrimination, harassment or victimisation may be subject to disciplinary procedures.

Hate Crime

Hate Crime is a crime committed against a person or property that is motivated by 'malice or ill-will towards a social group'.

- Social group can include
- Disability
- Race (including race, colour ethnic origin, nationality or national origins)
- Religion or belief
- Sexual orientation
- Transgender identity

Hate crime can include online behaviour which is intimidating or threatening, insults and name calling, offensive 'jokes' and bullying. All of this can potentially occur within social media.

If an NHS Dumfries and Galloway member of staff is partaking in this type of online behaviour then they are at risk of both prosecution and internal disciplinary procedures.

6. DOCUMENT CONTROL SHEET

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