Buckinghamshire Healthcare **NHS**

NHS Trust

Trust social media policy

Version 1.0

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Name of responsible committee/individual:	Lee Jones, Assistant Director of Communications
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Document History

Version	Issue	Reason for change	Authorising body	Date
1	0	New Policy	**Trust Management Committee**	**TBA**

Associated documents

BHT Ref	Title	Location/Link
BHT Pol 129	**Media Policy**	**Swanlive Intranet/Policies and Guidelines/Policies and Strategies/Corporate**
BHT S016	**Communications Strategy**	On request from the Communications Department
	Local plan – Major incident communications plan	On request from the Communications Department **http://swanlive/policies-guidelines/emergency-planning-business-continuity**
	Local plan – Web development guide	On request from the Communications Department
	Emergency plan, available at	http://swanlive/policies-guidelines/emergency-planning-business-continuity
BHT Pol 051	Information Governance Confidentiality Code of Practice	**http://swanlive/policies-guidelines/ig-policies-and-strategies**
BHT Pol 092	Whistle Blowing and Raising Concerns Policy and Procedures	**http://swanlive/sites/default/files/whistleblowing__raising_a_concern_bht_pol_092.pdf**
BHT Pol 032	Discipline Policy and Procedures	**http://swanlive/sites/default/files/disciplinary_policy_procedure_bht_pol_032.pdf**
BHT Pol 019	Code of Business Conduct for Trust Staff & Members of the Board Policy	**http://swanlive/sites/default/files/code_of_business_conduct_for_trust_staff_and_board_members_bht_pol_19.pdf**
BHT Pol 056	IT Internet Access Policy	**http://swanlive/sites/default/files/ig0034_it_internet_access_policy_v2.pdf**
BHT Pol 179	VIP policy	**http://swanlive/sites/default/files/hyperlink-vip_policy-_bht_pol_179.pdf**

Contents

Introduction and purpose

1.1.   Social media can be defined as the creation, sharing and exchange of information via online virtual communities or networks. Social media is different to the more traditional forms of media (such as print newspapers, TV or radio) because of its potential to reach many groups or individuals, its frequency, immediacy and permanence.

1.2.   Social media develops rapidly with almost constant innovation. It includes forums, blogs and microblogs (i.e : Twitter), social networks (i.e: Facebook), professional networks (i.e: LinkedIn), video content sharing (i.e: You Tube) and instant messaging (i.e: Blackberry Messenger). Social media is accessed via the internet from desk top computers as well as handheld devices such as tablet computers and smart phones.

1.3.   Buckinghamshire Healthcare NHS Trust recognises the increase in social media usage and its potential benefits to the organisation. This policy does not aim to stop legitimate use of the internet and social media, but instead aims to ensure that all Trust employees use social media appropriately and highlights the roles and responsibilities of staff.

1.4.   The policy applies to all staff employed by the Trust and volunteers. For the purposes of this policy the terms "staff" and "employees" refers to anyone carrying out business at the Trust whether paid or unpaid. Any queries or questions should be raised with a member of the communications team (see section 10.2).

1.5.   A failure to adhere to this policy may result in disciplinary action.

2.   Principles

2.1.   The policy has been created to:

- Ensure staff behave in a way which is consistent with the values of the Trust
- Protect the reputation of the Trust
- Protect the confidentiality of our staff and patients
- Protect the professional boundaries between staff and service users
- Outline to employees and volunteers what is an acceptable use of social media in connection to their employment

3.   Definitions

3.1.   In this policy "social media" refers to online activity where a user creates, shares or exchanges information and/or expresses opinion. This includes, but is not exclusive to, forums, blogs/microblogs, social and professional networking, photo and video sharing sites.

4.   Legislation and guidance

4.1.   The Trust has a legal obligation to comply with all appropriate legislation in respect of data, information and security. It also has a duty to comply with guidance issued by the Department of Health, advisory groups to the NHS and guidance issued by professional bodies.

4.2.   The legislation listed below refers to issues of security and/or confidentiality of personal identifiable information/data. This list should not be considered exhaustive:

- The Data Protection Act, 1998
- Freedom of Information Act, 2000
- Confidentiality: NHS Code of Practice, 2003

4.3.   The implementation of this policy is supported by other procedures, local plans and related policies. These are listed in the Associated Documents Table above:

5.   Roles and responsibilities

5.1.   Managers are responsible for ensuring employees are aware of this policy and that it is implemented in their areas. Managers are also responsible for taking appropriate action if the policy has not been adhered to.

5.2.   Staff are responsible for complying with this policy and behaving in an appropriate way in their social media usage.

5.3.   The communications department is responsible for delivering Buckinghamshire Healthcare NHS Trust's own social media channels.

6.   Standards for social media usage

6.1.   The general standards for using social media are to apply common sense. If you wouldn't wish your comments to be attributed to you in public then don't share them via social media, even if enhanced privacy settings have been applied to your login/profile – once something has been published to the internet it can no longer be considered to be private.

6.2.   Any comments posted on a social media account must be factual and verifiable.

6.3.   Staff must refrain from any action which brings them, their colleagues, the Trust or the NHS into disrepute either intentionally or unintentionally. Staff must behave at all times in a way which is consistent with the values of the Trust, and the reputation of their profession both on- and off-line.

6.4.   Staff must not purport to represent the views of the Trust unless with prior consent from the communications department.

6.5. We recognise the importance of staff joining in with industry/profession discussions. Staff can contribute to reputable discussion forums, networks and/or blogs associated with their profession. However, these discussions should be for the benefit of the Trust and add to the 'industry conversation'. Staff must behave respectfully and clearly state that views are of a personal nature. Always think about the consequences of what you say.

6.6. Any staff with professional regulation have a duty to uphold the reputation of their profession at all times and inappropriate conduct online could jeopardise registration if their fitness to practice is called into question. Staff represented by professional bodies should also be aware of any guidance set by the body regarding use of social media.

6.7. Buckinghamshire Healthcare NHS Trust does not allow staff to set up corporate social media accounts or any accounts which purport to be a corporate channel of communication. This includes accounts representing a specific service or department including clinical areas. Staff must follow this policy when using their personal accounts.

6.8. Staff must not use the Trust logo or the NHS lozenge without prior consent from the communications department.

6.9. When using personal social media staff must consider if/how they identify themselves as a staff member either explicitly (i.e.: in personal information or profile) or implicitly (i.e. : photographed in Trust uniform). All staff members must conduct themselves online in accordance with this policy.

6.10. If you have a personal Facebook profile and a professional LinkedIn profile, for example, it can be easy for internet users to connect your personal comments to your profession and place of work. If you are posting comments containing personal opinion it must be made explicit on your profile that these comments are your personal views only and do not represent those of your employer.

6.11. Staff must not identify any patients, carers or visitors in any comments, posts or uploaded content. Staff should not discuss patients, even if they are not referred to by name. Staff must in no way breach patient confidentially.

6.12. Staff must not seek to pursue personal relationships online with service users, outside of normal codes of conduct. If a member of staff is contacted by a patient to link to/become friends with them via their personal account they should be directed to the official Trust account(s).

6.13. Staff must not post comments or content which could be seen to bully, intimidate or harass colleagues or service users. Derogatory comments made about other employees will be classed as bullying and harassment, even if done outside of work hours and off work premises. Staff should refer to the dignity and respect at work policy and bullying and harassment policy for more information.

6.14. Staff should not post comments or information that could be considered sexually explicit, racist, sexist, derogatory, defamatory or otherwise inappropriate or that could harm the reputation of the Trust. This includes indirect posting (ie: "liking" another social media users negative comments or inappropriate post). Staff should refer to the Discipline Policy and Procedure for more information.

6.15. Staff should avoid anonymous use of social media. Posting under a pseudonym or anonymously can attract unwanted followers and social media users could still identify you if you use different social media channels and have similar user names or you link between the two.

6.16. If staff have an issue of concern they should not use social media to raise it. There are mechanisms in place for staff to speak out safely and we would encourage them to raise concerns as per the Trust's Whistleblowing and Raising Concerns Policy http://swanlive/sites/default/files/whistleblowing__raising_a_concern_bht_pol_092.pdf

6.17. Staff must not enter into any online network for commercial gain.

6.18. All Trust policies apply when using social media. If you have any concerns about confidentiality or a potential conflict of interest, please contact the communications department on 01494 734959 (AMH)

7. Seeking social media coverage

7.1. The Trust has established its own presence on social media sites (@buckshealthcare) and staff can contact the communications team if they wish to use them for promotional purposes. The department is open between 9am and 5pm every working weekday and is based in the Trust Offices at Amersham Hospital. They are contactable on **ext 4959 (AMH) or email communications@buckshealthcare.nhs.uk.** The communications managers and assistant director of communications are also available via mobile through the switchboard.

7.2. Staff must not set up their own groups/networks on any social media platform on behalf of the Trust or their own service. All networks must be established via the communications department who will manage all passwords and administrators of the accounts.

8. Social media and the media

8.1. If staff are contacted by the media via their personal social media accounts regarding any comment they have made they must contact the communications department before responding on **ext 4959 (AMH) or email communications@buckshealthcare.nhs.uk.**

9. Breaches of policy

9.1. Staff who become aware of a breach of this policy are asked to raise the issue with their line manager in the first instance.

9.2. Line managers should seek to resolve the issue informally before escalating to Human Resources for further support if required.

9.3. If the breach in policy could affect the reputation of the Trust the communications department need to be informed.

10.   Proposed dissemination

10.1.   This policy document is available on the Trust intranet and was circulated via the staff bulletin.

10.2.   Advice on this policy is available from the communications team on **ext 4959 (AMH) or email communications@buckshealthcare.nhs.uk.**

11.   How compliance will be monitored

11.1.   Social media monitoring is in place and is managed by the communications team however, it is every individual's responsibility to report any behaviour which breaches this policy.

11.2.   A monthly report of social media activity and coverage is compiled and reported to relevant senior management and the Trust Board.

12.   References

12.1.   BMA guidance http://www.medschools.ac.uk/SiteCollectionDocuments/social_media_guidance_may2011.pdf

12.2.   NMC guidance http://www.nmc-uk.org/Nurses-and-midwives/Regulation-in-practice/Regulation-in-Practice-Topics/Social-networking-sites/

12.3.   GMC guidance http://www.gmc-uk.org/guidance/12022.asp

12.4.   HCPC guidance http://www.hpc-uk.org/assets/documents/100035B7Social_media_guidance.pdf