Hampshire Hospitals **NHS**
NHS Foundation Trust

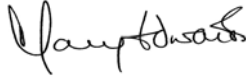## Website, Intranet and Social Media Policy -   HH(1)/CO/665/16

Previous document(s) being replaced		
Location	**Policy No**	**Policy Name**
HHFT	HH(1)/CO/665/13	Website, Intranet and Social Media Policy

Document Summary		
This policy is aimed at HHFT staff and covers the ownership, responsibilities and use of the HHFT website, HHFT intranet and social media.		

Ownership	**Author**	█████████
	Job Title	Communications Officer
Document Type	**Level**	Level 1 Trust-wide
Related Documents	**Document Details**	Corporate Style Guide
		Information Governance Policy
		Management of Conduct Policy
		Information Security Policy
		Media Handling Policy
Relevant Standards	**CQC Outcome**	Outcomes 1 & 14
Equality Analysis	**Completed by**	█████████
	Date Completed	14 October 2016
Final Document Approval	**Committee**	Policy Approval Group
	Date Approved	24 October 2016
Specialist committee(s) recommending approval	**Committee(s)**	
	Date Recommended	
Final Document Ratification	**Committee**	Executive Committee
	Date Ratified	27 October 2016
Authorisation	**Authoriser**	Mary Edwards
	Job Title	Chief Executive
	Signature	*[signature]*
	Date Authorised	7 November 2016
Dissemination	**Target Audience**	All Trust staff

Dissemination and Implementation Plan		
Action	**Owner**	**Due by**
Publicise detail of new document via Intranet and Midweek message	IPCT and Communication Team	Within 10 w/days of publication
Communication to all Senior Managers to advise publication of policy	BNHH Healthcare Library	On publication
The policy will be available on the intranet	BNHH Healthcare Library	Within 10 w/days of authorisation
Review	**Expiry date**	October 2019

	Review date	July 2019

Document Control – Document Amendments				
Version No.	Details	Key amendments to note	By whom	Date
1	Review of old BNHFT policy to produce harmonised policy and to update policy to include mention of social media	Significant changes made to entire document.	███████	June 2013
2	Review policy with changes to website processes and updated social media practices, including HHFT Staff Facebook group	Changes to website processes, updated social media guidance, including reference to the HHFT Staff Facebook group	███████	October 2016

Contents

1. **Introduction**

   The purpose of this policy is to ensure that all staff are aware of the appropriate usage of the HHFT website and intranet and how to get information published, updated or removed. This policy also covers the use of social media, both corporately and personally.

2. **Purpose**

   This policy sets out the process for publishing material on the HHFT website, intranet and social media, and gives guidance for appropriate usage of these channels.

3. **Scope**

   This is a trust-wide policy which applies to all Trust employees regardless of their protected characteristics as defined by the Equality Act 2010 namely, age, disability, gender reassignment, race, religion or belief, gender, sexual orientation, marriage or civil partnership, pregnancy and maternity, length of service, whether full or part-time or employed under a permanent or fixed-term contract, irrespective of job role or seniority within the organisation.

   Where an employee has difficulty in communicating, whether verbally or in writing, arrangements will be put in place as necessary to ensure that the processes to be followed are understood and that the employee is not disadvantaged during the application of this policy.

   In line with the Equality Act 2010, the Trust will make reasonable adjustments to the processes to be followed where not doing so would disadvantage an employee with a disability during the application of this policy and associated processes.

   This policy does not cover the issue of appropriate internet usage by staff, which is handled by IT/HR and covered under the IT Security policy.

   This policy focuses on content for both website and intranet rather than technical issues.

4. **Explanation of Terms**

   Website - Website refers to the HHFT website which can be viewed by anyone with internet access at www.hampshirehospitals.nhs.uk

   Intranet – Intranet refers to the internal system that can only be accessed while on an HHFT computer or device, or while logged into the HHFT network remotely.

   Social media – Social Media includes any form of web based communication channels which provide participation, interaction or engagement through user-generated content. Can include, but not limited to, blogs, discussion forums, social networking sites such as Facebook, video sharing sites such as Youtube or Vine,

opinion sites like NHS Choices or micro-blogging sites such as Twitter. Social media can be publically accessible, via closed groups, or hosted and used internally.

5. Duties

5.1 Post Holders with duties

Chief Executive (CE) – The Chief Executive has ultimate accountability for communication with staff and public, and for the reputation of the Foundation Trust. Responsible for ensuring that robust systems are in place to ensure the quality of information provided on the website and intranet, and that staff act appropriately and sensibly in their use of social media.

Head of Communications and External Affairs – accountable for communication with staff and public, and for the reputation of the trust. Devolved responsibility for ensuring that robust systems are in place to ensure the quality of information provided on the website and intranet.

Communications Manager – responsible for operation of the communications team, in:
- Managing relationship with IT department for technical support and development
- Managing external supplier for website hosting and support
- Managing development and working with the appropriate part of the organisation to keep content up to date, engaging and meeting the needs of audiences.

Divisional Operations Directors and Associate Directors – ultimately responsible for the content published in the sections that cover their parts of the organisation on both the website and intranet. They may devolve this responsibility a member of their team.

Content editors – the people in divisions/departments nominated to be responsible for particular sections of the intranet.

Employees – responsible for complying with the policy and guidance within.

Managers and HR – responsible for dealing with instances where staff have not followed the policy and guidance. May involve the Management of Conduct policy.

5.2 Committees and Groups with duties

At present, there is no formal committee or group responsible for website development.

6. HHFT Website – www.hampshirehospitals.nhs.uk

The function of the website is to provide a professional, user-friendly, clear and easily accessible information on HHFT and its services.

The HHFT website is currently hosted externally and an external supplier is in place to manage this and provide technical support.

The Communications team review and update the content on the HHFT website. All have full access to publish material without an additional approval process being in place, using their professional knowledge of communications, relevant policies and guidelines and under the guidance of the communications manager.

In a very small number of cases, other HHFT staff may be given access to update a specific part of the website, e.g. to keep staff details on wards up to date, but an approval layer (publishing workflow) is in place so that pages have to be submitted to the communications team before publishing.

Do not provide material to the Communications team for publishing which is, in whole or part, owned by another person or organisation, without explicit, documented permission for HHFT to publish it on our website. When permission is obtained we will always provide copyright or other ownership attribution on the page.

Do not take your own photographs for publishing on the website without speaking to the Communications team first. Consent must be sought. The Communications team can advise.

Information on the website should not:
- Leave the Foundation Trust open to legal action
- Misrepresent the Foundation Trust or its positions
- Cause offence or harassment

The Communications team will refuse to publish any information where there is a concern about the above.

Whenever a web page is edited or checked for accuracy, a note will be added to the bottom of the page which states the date when the page was last reviewed.

Each department has the responsibility to regularly check content about their service and advise the communications team of any changes that need to be made.

7. Intranet
The function of the intranet is to enable staff to easily access information they need as part of HHFT, the organisational values and job-specific information. It is a means we have of sharing, organising, storing and retrieving material online. At present, it is

secure in so far as only people who are logged on to the HHFT network can access it.

The Communications team are responsible for the homepage and overall structure of the content of the intranet, with responsibility for individual pages devolved to departments and divisions to keep updated. The intranet is supported technically by the IT department, while the Communications team are available to support with advice, content editing and uploading.

Department heads/managers should nominate someone from their team to be the intranet content editor and the Communications team will add their editing permissions and provide guidance.

There is no test environment or ability to submit pages for approval, so all changes must be checked for accuracy and go through departmental approval processes before being published.

Do not publish material which is, in whole or part, owned by another person or organisation, without explicit, documented permission for HHFT to publish it on our website. When permission is obtained we will always provide copyright or other ownership attribution on the page.

Do not take your own photographs for publishing on the intranet without speaking to the Communications team first. Consent must be sought. The Communications team can advise.

The intranet contains the ability for departments and specialties to have interactive features in their areas such as forums and blogs. These should be discussed with the Communications team and web developer before being added, and the responsibility for the content remains with the department head/manager. The guidance below in relation to appropriate use of social media also applies internally.

Policies, guidelines and SOPs on the intranet should be the most up to date version and older versions deleted. These documents are held in a central area on the intranet. Policies are kept up to date by the Healthcare Library and Governance teams. Individual departments should link to this area rather than publishing local copies of documents, to ensure the most up to date version is being used.

Try and follow the 'three click rule' – that you should either be able to find information via the search or in no more than three clicks from the homepage. If information is already published elsewhere (e.g. on the website), link to it rather than reproducing another copy that has to be kept up to date.

The Communications team cannot be aware of all staff changes, changes in procedures and other departmental information. Therefore it is the responsibility of the departments and divisions to make sure their content is up to date. If the Communications team become aware of out of date content, they will firstly contact the intranet content editors for that area and ask them to update. If this is not done,

depending on the urgency of the issue, the Communications team may edit the page or temporarily take it down until the issues can be clarified.

Whenever an intranet page is edited or checked for accuracy, a note will be added to the bottom of the page which states the date when the page was last reviewed. The Communications team do review intranet pages and contact content editors (or Operations Directors where there is no content editor for that section) to encourage them to review and update their pages. They rely on departments and divisions to review their content and publish new information in a timely manner when requested.

When inappropriate content, incorrect style or other problems with an intranet page are discovered, these will be flagged to the content editor by the Communications team and they will be asked to correct the issues. If the author cannot be contacted, depending on the urgency of the issue, the Communications team may edit the page or temporarily take it down until the issues can be clarified.

Information on the intranet should not:
- Leave the Foundation Trust open to legal action
- Misrepresent the Foundation Trust or its positions
- Cause offence or harassment

The Communications team will immediately remove any material which they discover and feel is at risk of doing the above, and contact the intranet content editor for that section to discuss.

8. **Social Media**

The Communications team set up and manage HHFT's presence on social networking sites. At present this includes corporate accounts on Facebook, Twitter, Instagram, Youtube and NHS Choices. The Communications team are responsible for adding content to social media. Anyone wishing to publish to these channels should contact the Communications team.

The HHFT Staff Facebook group is a private group set up as an additional way to keep staff informed about things going on in the Trust. It is also an additional way for staff to communicate with one another.

Staff must apply to join the group and are only added by a member of the communications once they have established that they are a member of staff. Members of staff who leave the trust should also leave the group, but the communications team will check on a monthly basis to ensure that members of staff who leave the trust are removed from the group.

All members are encouraged to post to the group. Posts do not need to be cleared with the communications team, but staff should follow the guidance in Appendix B of this policy. Content deemed to be inappropriate will be removed by the

communications team and if necessary, this will be flagged with relevant managers/HR and the Management of Conduct policy may be followed.

HHFT has a LinkedIn account, which is managed by HR for recruitment purposes.

Members of staff should not set up new social media accounts to represent any part of HHFT, or seek to represent HHFT themselves through an individual/personal account in the name of HHFT, without speaking to the Communications team. HHFT takes no responsibility for Individual staff members' personal/private social media activity undertaken in their own name on their own account and in their own time, however this may be managed via their line manager or HR under the Management of Conduct policy if appropriate.

There is a wealth of professional information, networking opportunities and chances to share knowledge on social media, which some staff will want to engage with and benefit from. However, social media can blur the lines between personal and professional life and members of staff are reminded of the need to act appropriately when using social networking sites. This is to keep staff safe and also ensure that the reputation we all work hard for is protected.

Staff should follow the guidance in Appendix B.

If members of staff are contacted by the media about anything they have posted on social media, they should alert the Communications team immediately.

The Communications team carry out monitoring of social media as part of their usual scanning process. This may not be comprehensive as it is not a paid-for service, and anyone who sees content that they feel others in the organisation should know about, they should flag this to the Communications team. The Communications team will make the judgement about whether to observe or respond to a discussion and seek the relevant information and approvals.

The Communications team do not search for staff active on social media but will flag anything of concern that they come across as part of their normal scanning to the relevant managers/HR and the Management of Conduct policy may be followed.

9. Stakeholders Engaged During Consultation

Stakeholder	Date of Consultation
Infection Prevention and Control (Lead Infection Prevention & Control Nurse)	7/10/2016
Health and Safety (Health and Safety Advisor)	7/10/2016
Safeguarding (Trust Safeguarding Lead)	7/10/2016
Information Governance (Information Governance Manager)	7/10/2016
Risk and Compliance (Risk and Compliance Manager	7/10/2016

Divisional Directors (Operational)	7/10/2016
Equality and Diversity Lead (Equality & Diversity)	7/10/2016

10. Dissemination and Implementation

The Policy will be disseminated in the following ways:

Action	Owner
Publicise detail of new document via Intranet and Midweek message	Communications Team
Communication to all Senior Managers to advise publication of policy	BNHH Healthcare Library
The policy will be available on the intranet	BNHH Healthcare Library

11. Training

Individuals in the Communications team should receive in-house/on the job training to ensure they are aware of their responsibilities and able to use the intranet and website content management systems.

Individuals identified by their manager as needing to update the intranet should receive training/guidance from a member of the Communications team to ensure they are aware of their responsibilities and able to use the intranet content management system. There is also a user guide that the Communications team will provide.

Anyone who publishes information on the website or intranet, or who copies and reproduces information from the intranet in any way, should also be familiar with the Information Governance policy.

The Communications team does not offer any training specifically in the appropriate use of social media, but guidance can be given.

12. Monitoring Compliance with the Document

Compliance with the policy will be monitored in the following way:

Minimum requirements	Requirement Reviewed by	Method of Monitoring	Frequency of Review
Intranet pages to be reviewed as required	Departments /divisions	Departments/divisions to instigate reviews.	As required
Website pages to be reviewed as required	Communications team	Departments/divisions to contact communications team with amendments.	As required

Content editor list to be reviewed as required	Communications team	Departments/divisions and communications team to work together to ensure content editors are active	As required
Social media reviewed each working day and more frequently in times of crisis or high attention	Communications team	Part of daily work of Communications team.	Daily

13. References
[NHS Employers Social Media Guidelines](#)

14. Associated Documentation
[Information Governance Policy](#)
[Corporate Style Guide](#)
[Management of conduct policy](#)
[Information Security Policy](#)
[Media Handling Policy](#)

15. Contributors

Contributor Job Title	Contributor Name
Communications Officer (Author)	
Head of Communications and External Affairs (Reviewer)	

Appendix A – Equality Impact Assessment

Document Name: Website, Intranet and Social Media Policy			
Part 1 – Policy Author to complete and forward on to an EA Lead for sign off			
1.	Could the application of this document have a detrimental equality impact on individuals with any of the following protected characteristics? (See Note 1)		
a	Age	No	
b	Disability	No	
c	Gender reassignment	No	
d	Race	No	
e	Religion or belief	No	
f	Sex	No	
g	Sexual orientation	No	
h	Marriage & civil partnership	No	
i	Pregnancy and maternity	No	
2.	If 'Yes' to question 1, do you consider the detrimental impact to be valid, justifiable and lawful? If so, please explain your reasoning.	N/A	
3.	Specify with which, if any, individuals and groups you have consulted in reaching your decision.		
Part 2 – Equality Analysis Lead to complete and forward back to the Policy Author			
Provide a brief summary of the potential impact of the policy and whether sufficient consideration has been given to the Equality Duty.			
1.	Is this document recommended for publication? If 'yes' go to question 3 if 'No' complete number 2 below.		
2.	This document is not recommended for publication because:		
a	Amendments are suggested as follows:		
b	A more detailed equality analysis should be undertaken as follows:		
c	Other (please specify)		
3.	Specify with which, if any, individuals and groups you have consulted in reaching your decision.		
Name: Paul Bond Job Title: Assistant Director Estates Date: 14 October 2016			
Part 3 – Policy Author to complete on receipt of part 2 and before forwarding for final policy approval			
1.	I have reviewed the Part 2 assessment and have made the necessary amendments to the policy.		

If you have answered 'no', please explain why not		
Name: ██████████	Job Title:	Communications Officer
Date: 14 October 2016		

Note 1

Under the terms of the Equality Act 2010 public sector Equality Duty, the Trust has a legal responsibility to think about the following three aims of the Equality Duty as part of our decision making and policy development.

- **Eliminate unlawful discrimination**, harassment and victimisation;
- **Advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and
- **Foster good relations** between people who share a protected characteristic and people who do not share it.

Appendix B - Social media guidance for staff

If a member of staff identifies their association with HHFT or the NHS on their personal social media account – for example, by stating they work for HHFT or posting pictures of themselves in uniform or at work - and/or discusses their work, they are expected to behave professionally, and in a way that is consistent with the organisation's values and policies.

Do not be tempted to respond to critical comments about HHFT hospitals if you see them. Instead, bring them to the attention of the Communications team who will determine an appropriate response. Not everything will need a response.

Ensure your privacy settings are high enough that you don't share more than you would like to, with anyone other than your friends.

If you wouldn't write it on the notice board in the canteen, don't put it on social media.

We encourage staff to be active members of the HHFT Staff Facebook group as a way to communicate with each other on both professional and social topics. Social media is a useful way to keep informed on topics of interest.

Do not use the HHFT logo, NHS logo or any HHFT imagery as your personal profile picture or avatar. This is to avoid confusing members of the public into thinking that you are giving HHFT's opinion/advice and to protect copyright.

If you feel you have been targeted on social media because of your role or because of a protected characteristic (your race, gender, disability, age, religion/belief or sexual orientation) seek help and advice as soon as possible. Save a copy of the posts or messages and report them to the site owners. Speak to your line manager. The Employee Assistance Programme can also offer you support. The details for the Employee Assistance programme are on the intranet.

It is important for employees to consider cultural differences when using social media and to be mindful that in one culture words/language may be viewed differently and could have other meanings.

Refer to and follow the guidelines from your own professional body.

Guidance from other organisations
British Medical Association Social Media Guidelines
Nursing and Midwifery Council Guidelines for Social Media
Chartered Society of Physiotherapists Guidelines for Social Media
Guidance published by NHS Employers

Appendix C - HHFT Intranet User Guide

HHFT Intranet User
Training Guide.doc