Homerton University Hospital NHS

NHS Foundation Trust

Social Media policy	

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Contents:

1. Introduction

Online Social Networks (OSN) or social media are the terms commonly used for websites which allow people to interact with each other in some way – by sharing information, opinions, knowledge and interests. As the name implies, social media involves the building of online communities or networks, encouraging participation and engagement. For more on the use of the Trust internet/intranet, see separate policy guidelines.

Social networking websites (such as Facebook, LinkedIn, Instagram, Twitter and YouTube) are perhaps the most well-known examples of social media, but the term covers other web-based services. Examples include blogs (a contraction of the term web-log); audio and video podcasts; 'wikis' (such as Wikipedia); message boards; social bookmarking websites (such as del.icio.us); photo, document and video content sharing websites (such as flicker and YouTube); and micro-blogging services (such as Twitter).

These media provide a number of benefits for us in our personal lives. However, in online social networks the lines between public and private, personal and professional are blurred. Just by identifying yourself as a Trust employee, staff are creating perceptions about their expertise and about the Trust with our patients, Governors and members, NHS colleagues, and the general public. Trust employees are responsible for ensuring all content associated with them (professional and personal) is consistent with their work, with the Trust's values and, where appropriate, in accordance with the relevant professional codes of conduct.

Any information that can reasonably link staff to the Trust must be consistent with the standards of behaviour we expect within the Trust. Failing to adhere to these standards will be treated in the same way as any other breach of organisational standards, which may include formal action in accordance with the Trusts Disciplinary Policy and Procedure and/or Maintaining High Professional Standards for medical staff.

This policy should be viewed in conjunction with the following Trust policies:-

Confidentiality Code of Conduct Policy
http://intralive/policies-resources/policies-and-guidelines-a-z/c/confidentiality-code-of-conduct/?from=3466

FOI Policy
http://intralive/policies-resources/policies-and-guidelines-a-z/f/freedom-of-information/?from=3466

Email and Network Policy
http://intralive/policies-resources/policies-and-guidelines-a-z/e/email-and-network/?from=3466

2. Summary

This policy sets out the principles which staff are expected to follow when using social media outlets in a professional capacity. The internet involves fast-moving technologies and it is impossible to cover all circumstances. However, the principles set out in this document must always be followed.

3. Scope

This policy applies to all staff and covers the development and maintenance of all social media aspects that relate to the Trust.

4. General rules

Whether using OSN in a personal or a professional capacity, there are a number of rules Trust staff must follow:

- Staff must not reveal confidential information about our patients, staff, or the Trust. However, those that do divulge their employer must state that they are tweeting/blogging etc. in a personal capacity.
- Staff and contractors who use Social Media must not disclose information of the Trust that is or may be sensitive or confidential, or that is subject to a non-disclosure contract or agreement. This applies to information about service users, patients, other staff and contractors, other organisations, commercial suppliers and other information about the Trust and its business activities.
- Unauthorised disclosure of confidential information may result in formal action being taken in accordance with the Trusts Disciplinary Policy and Procedure and/or Maintaining High Professional Standards for medical staff, up to and including dismissal.
- Staff must not engage in activities on the internet which might bring the Trust into disrepute. Staff and contractors are not authorised to communicate by any means on behalf of the Trust unless this is an accepted normal part of their job, or through special arrangement that has been approved in advance by the Communications Team. No social media sites or pages relating to the Trust should be set up by staff and/or contractors without prior approval from the Communications Team.
- Staff should act in a transparent manner when altering online sources of information such as websites like Wikipedia
- Staff must not use the internet in any way to attack, abuse or undermine colleagues
- Staff must not post defamatory, derogatory or offensive comments on the internet about patients, colleagues, their work, or the work of the Trust
- Any difficult or inappropriate communications that cannot be successfully dealt with by the departmental content editor/manager must be escalated to the communications manager who will take appropriate action. Corporate logos or other visible markings or identifications associated with the Trust may only be used where prior permission has been obtained from the Communications Team. Staff and contractors must not

share details of the Trusts implemented security or risk management arrangements. These details are confidential, may be misused and could lead to a serious breach of security occurring.

- All Trust contracts must include a section on the contractors complying with this policy (in relation to Homerton).

Any online activities associated with work for the Trust must be discussed and approved in advance by the member of staff's line manager. For example by displaying a @nhs.net or @homerton.nhs.uk address, by joining the NHS network or Trust-related networks on social network sites, or by making reference to the Trust as a member of staff's employer.

4.1 Clarity of ownership

It must always be clear to users whether the website they are using is a Trust site, run by the Trust for NHS purposes, or whether it is a personal page or website run by an individual or group for private purposes.

4.2 Social networking sites (professional use)

Homerton will use predominantly three areas: Twitter, Facebook and YouTube, to facilitate social media in the interests of control and consistency. Any service requests to use Twitter, Facebook, YouTube or any other social media should detail their reasons for the need of alternative arrangements in the available social media request form and send it to the communications manager. See appendix 1 – request form.

Social networking is succeeding in reaching out to many groups and audiences and examples for Homerton might include:

- using Twitter to provide links to press releases, announcements, and Trust publications such as Homerton Life and the Annual Report
- using Facebook to reach out to seldom heard groups and the younger audiences as well as hard to reach groups and religious/cultural communities
- using Twitter or Facebook to engage with 'interested audiences' such as our members providing instant updates and news
- using OSN sites to communicate with health care professionals giving information on training/briefing sessions and publications, and news or research and innovations
- using OSN sites for surveys and consultation.

Video:

Vimeo is currently the depository for all Homerton videos. All videos should be of appropriate standard of quality in representing Homerton Hospital and will be submitted to the communications team for review prior to uploading. Any videos

that are considered to be below the required standard or without adequate branding will be returned with suggestions for improvement and re-editing.

Picture galleries:

For those services wishing to be able to link visitors to a photo gallery to show photographic stills it is the Trust's policy for the service to use a Facebook account which will give adequate scope for photo galleries and general information. For those who do not use Facebook for their main social media it is recommended that the service creates a Facebook account solely for the purpose of photographic images.

The Trust supports the development of OSN sites provided they add value to the Trust, its services and its reputation.

If a team or individual wish to launch an OSN site such as a blog/Twitter account, they should contact the communications manager initially to discuss the reasons for opening the account and what they intend putting on the site in terms of content. If the decision is made to proceed, the request needs to be formally made by submitting an OSN request form to the communications manager. OSN requests forms must be signed by the service or department manager. The request must illustrate the potential benefit to patients or colleagues within the Trust and the NHS as a whole.

All OSN accounts must have a named content editor who is responsible for ensuring the content of the site is accurate and up to date. Setting up a blog or twitter account and failing to submit information to it on a regular basis will lead to approval being rescinded and the site being closed down.

The communications team can help advise on the most suitable form of OSN for the service and can support the service in setting up the OSN.

The communications manager will use Hoote Suite which is a social media monitoring tool to enable all Trust social media to be moderated from a single PC.

4.3 Social networking sites (personal use)

Social networking sites like Facebook and Twitter provide a great way for people to keep in touch with friends and colleagues. However, through the open or semi-open nature of such sites, it is also possible for third parties to collate vast amounts of information.

All Trust staff must be mindful of the personal information they disclose on social networking sites, especially with regards to identify theft. Making information such as their date of birth, place of work and other personal information publicly available can significantly raise the risk.

Where staff can be associated with the Trust (through providing work details or joining a Trust or NHS network) they should also act in a manner which does not bring the Trust, the NHS or their profession, into disrepute. This applies to both

open and private sections of a site if staff are identifying themselves as an employee of the Trust.

If staff are contacted by the media about posts made on a social networking site that relate to the Trust, they must talk to their manager before responding. The communications manager must also be consulted.

Use of the internet should primarily be for business purposes. Occasional and reasonable personal use is permitted, e.g. during lunch breaks, provided that such use does not interfere with the Trust's policies, procedures and contracts of employment.

The Trust has responsibility for employees' activities and an individual has responsibility for his or her own activities when using Trust IT equipment. This means the Trust and an individual can both be at risk of litigation resulting from the actions of any individual on an OSN site.

4.4 Blog sites

Bloggers may use their personal blogs to discuss their Trust work in ways that benefit the Trust. These guidelines are not intended to restrict this, as long as confidential information is not revealed and the Trust is not brought into disrepute.

Personal blogs and websites must not reveal confidential information about our patients, staff, or the Trust. This might include aspects of Trust policy, plans, or details of internal discussions. If in doubt about what might be confidential, staff should consult their line manager.

Blogs or websites which do not identify the blogger as a Trust employee, do not discuss the Trust, and are purely about personal matters would normally fall outside these guidelines.

If staff have a personal blog or website which indicates in any way that they work at the Trust, they must discuss any potential conflicts of interest with their line manager and/or seek advice from the communications manager.

Similarly, if staff wish to start blogging, and say they work for the Trust, they must discuss any potential conflicts of interest with their line manager.

If a blog makes it clear that the member of staff works for the Trust, it must include a simple and visible disclaimer such as "These are my personal views and not those of the Trust". The Trust's logo must not be used on personal web pages.

Personal blogs and websites must not be used to attack or abuse colleagues or patients. Staff members must respect the privacy and the feelings of others. Remember also that if a law is broken on a blog (for example by posting something defamatory or infringing copyright), the individual will be personally responsible.

If staff think something on their blog or website gives rise to concerns about a

conflict of interest, and in particular concerns about impartiality or confidentiality, they should discuss it with their line manager.

If staff are offered payment to produce a blog for a third party this could constitute a conflict of interest and must be discussed with their line manager.

If staff are contacted by the media about posts on their blog that relate to the Trust, they should consult their line manager before responding. The communications manager should also be consulted.

4.5 Content management

The approving service manager(s) are expected to conduct a monthly review of any OSN venture over seen by them. This review is to check for regular and relevant submissions that add value. Regular reviews will also be carried out by the web team.

The communications manager will keep a register of all Trust approved OSN sites. This list will reviewed on a quarterly basis to ensure sites are providing regular and relevant content that adds value. The regularity of posts is not pre-determined and will change from one approval to the next.

The content editor will be responsible for ensuring that:

- audiences can easily tell whether the group is open to all or only to invited individuals be they Trust staff or members of another stakeholder group
- the purpose of the blog/social network group is clearly laid out for all to see
- a disclaimer is displayed prominently on the site, for example: The views expressed in this (group/blog/website/forum etc..) are those of the authors and do not necessarily reflect the views of Homerton University Hospital NHS Foundation Trust
- the communications team is fully aware of the blog/social network group/site, have an up-to-date link to the group/site, know who the current content editor and backup administrator are and are made aware of any significant changes to its administration and/or purpose
- the communications manager has a record of the content editor's login username(s) and password(s)
- the content editor hands over ownership of the blog/social network group/site to another appropriate staff member if they choose to leave the group or if they leave the Trust. If no staff member is available, full ownership of the site should be passed to the communications manager, who will make the appropriate provision to have the account managed elsewhere or to shut down the account completely.
- any passwords used to administer an external group/site are changed if a former content editor leaves the Trust
- the NHS lozenge or the Trust logo is not used without the permission from the Trust (via communications manager)
- the line manager and HR are immediately made aware of accusations of any racist, sexist, homophobic, sexually explicit, abusive or otherwise

objectionable posts/comments made on the site be they made by a member of staff or an external contributor.

4.6 Posting content to any OSN site

When submitting content on a work related subject to an approved OSN content editors must always identify themselves as working for the Trust. They must ensure that any content published is consistent with their role in the organisation and doesn't compromise their own reputation or that of the Trust, and must not breach patient, staff or the Trust's confidentiality.

Staff must be careful how they represent themselves in any OSN when submitting content on a work related subject. They must ensure there is a clear distinction between a site used to share thoughts, opinions or accounts of events as staff member and a site being used to represent Homerton's services.

All Trust approved OSN sites must contain a disclaimer. For example: The views expressed in this (group/blog/website/forum etc) are those of the authors and do not necessarily reflect the views of Homerton University Hospital NHS Foundation Trust.

4.7 What not to do

Submissions to any Trust approved OSN site must not contain fraudulent, harassing, embarrassing, sexually explicit, profane, obscene, intimidating, defamatory or otherwise unlawful or inappropriate information that would be offensive to readers of the submission or would otherwise breach any Trust Policy or break the law.

The following matters are examples that may result in formal action being taken in accordance with the Trusts Disciplinary Policy and Procedure and/or maintaining High Professional Standards for medical staff up to and including dismissal and may lead to a referral to a third party such as counter fraud, police or professional body:

- Publishing confidential information, business or personal, about or acquired from the Trust in a public post. This might include for example, revealing confidential information relating to patients, staff members, the Trust or contractors. This list is not exhaustive. Staff must consult their line manager if they are unclear about what information might be confidential.

- Criticising or causing embarrassment to the Trust, its patients, other stakeholders or staff in a public post (including any website).

- Advertising or selling information about or acquired from the Trust for publication by others.

4.8. Use of other languages in OSN sites

There is no legal requirement for the Trust to provide information published through an OSN site in any specific language, however on request the Trust does have a legal obligation to provide a translation of any publically published information in a prompt and timely fashion. If asked to provide information in another language please contact the PALs team for further advice on ext 5144 or email: pals@homerton.nhs.uk

Improving access to published content by providing it in multiple languages should be thought through when considering the purpose of and the audience for a proposed OSN site. If providing multilingual versions of twitter micro blogs, Facebook comments or blog submissions is deemed a necessity then it should be done professionally. Staff must not refer to online translation tools such as Google translate or Yahoo Bebel fish as a quick fix. Such tools can be useful but without proper proof reading by a professional translator can lead to errors in communications and serious misunderstandings.

4.9 Unsuitable links

Links to external websites are permitted in all forms of social network/blog/micro blog sites and are acceptable as long as they are not deemed to be unsuitable. A web page is classed as unsuitable if it contains, or directly links to, material which is:

Offensive**:**

- Pornography and sexually explicit content.
- Text and images likely to offend.
- Hate sites (on grounds of race, religion, gender or sexual orientation).
- Gratuitous violence.

Unlawful**:**

- Condones or encourages unlawful acts.
- Breaches copyright law or encourage others to do so.
- Defamatory and/or in contempt of court.
- Hacking or other technical disruption to online services.

Virtual or real risk to the user of your group**:**

- Sites which might compromise a user's computer for example a site which initiates a download without prior confirmation.
- 18+ sites for example gambling, alcohol, tobacco related or any other site deemed contrary to the core values of the NHS.
- Pay-to-view or other subscription sites.

5. Hacked or fake accounts

Staff must always notify their line manager and the communications manager if they suspect the Trust approved OSN has been 'hacked'. That is if the member of staff thinks the username and password for the site have been compromised and/or unexplained contributions to the site are coming from someone pretending to be from the Trust.

5.1 Respecting others when using social networking sites

Social networking sites allow photographs, videos and comments to be shared with thousands of other users. However, it may not be appropriate to share work-related information in this way.

For example, there may be an expectation that photographs taken at a private Trust event will not appear publicly on the internet, both by those present and others not present.

Staff must be considerate to their colleagues in such circumstances and must not post information when asked not to. Staff must also remove information about a colleague if that colleague asks them to.
Under no circumstances must offensive comments be made about patients, Trust colleagues or Trust business on the internet. This may amount to cyber-bullying and may lead to formal action in accordance with the Trust's Disciplinary Policy and Procedure and/or Maintaining High Professional Standards for medical staff up to and including dismissal.

5.2 Open access online encyclopaedias

Staff may find in the course of their work errors in online encyclopaedias. If they edit online encyclopaedias at work the source of the correction may be recorded as an NHS internet protocol (IP) address. The intervention may therefore look as if it comes from the Trust itself.

Staff should therefore not act in a manner that brings the Trust into disrepute and should not post derogatory or offensive comments on any online encyclopaedias.

If correcting an error about the Trust it must be transparent as to who the member of staff is and the capacity in which they are doing this. Criticism of the Trust should not be removed. Instead, the Trust should respond constructively to legitimate criticism.

Staff must not remove derogatory or offensive comments but report them to the communications manager for them to take action.

Before editing an online encyclopaedia entry about the Trust, or any entry which might be deemed a conflict of interest, staff must consult the house rules of the site concerned and, if necessary, ask permission from the communications manager. Staff may also need to seek advice from their line manager and/or the communications manager.

5.3 Data Protection Act and the Freedom of Information Act

Use of OSN sites must comply with the Data Protection Act 1998 (relevant for any sites which have the potential to collect or handle personal information), the Freedom of Information Act 2000 and the Public Records Act 1958 (relevant where internal OSN sites and external OSN sites are potentially used for business purposes).

5.4   Review

This policy will be reviewed every 6 months. Earlier review may be required in response to exceptional circumstances, organisational change or relevant changes in legislation or guidance.

5.5 Monitoring & Audit Form:

Measurable Policy Objective	Monitoring/Audit	Frequency of monitoring	Responsibility for performing the monitoring	Monitoring reported to which groups/committees, inc responsibility for reviewing action plans
To establish a guidance framework that Homerton staff can work to in achieving safe and successful social media	All social media feeds to be monitored by the communications team using Hotsuite (a specific comms monitoring tool)	Continual live monitoring	Communications team	Communications manager Director of Organisation Transformation Information governance committee

5.6 Sources of Evidence; References / Bibliography –Mandatory: Document the evidence used to underpin the policy

Acknowledgements and references to:

www.NHSemployers.org

Patient confidentiality and data protection referenced from:

Data Protection Act
Caldicott Principles
Public Interest Disclosure Act 1998

Appendix 1

Online social network site – request form

Name:
Job title:
Email address:
Contact number:
Division/directorate:
Approving line manager: Position/title:
Line Manager email address:
Line Manager contact number:
Name and contact details of site Administrator if different from above:
Name and contact details of second site Administrator
Social network site (for example Facebook, Twitter, etc):
Is site to be open to all or only by invite:

Who will be your Intended audience:
Anticipated numbers using the site:

Please outline your reasons for the need to start a social media presence for your service
Please indicate how much time and resources you will have available to maintain your social media?
What kind of social media are you intending to use and why?
Please outline your marketing/communication proposals and strategies
Please note that the site will be set up for you if approved. You are required to supply possible usernames, a preferred email address for correspondence and confirmation of account set up as well as password. The password must be unique to you and not used elsewhere. The web team will keep a record of the password used.
Preferred username:
Preferred email address:
Preferred password:

Equalities Impact Assessment

This checklist should be completed for all new Corporate Policies and procedures to understand their potential impact on equalities and assure equality in service delivery and employment.

Policy/Service Name:	Social media policy
Author:	Daniel Waldron, Nicholas Ward, Mark Purcell
Role:	Transformation, Communications, Press
Directorate:	Corporate
Date	20/2/2014

Equalities Impact Assessment Question	Yes	No	Comment
1. How does the attached policy/service fit into the trusts overall aims?			To facilitate strong, safe and clear regulations and guidance to assist in the rolling out of safe and secure social media to Homerton Hospital.
2. How will the policy/service be implemented?			By advertising the availability of this area for services by email and intranet accompanied by this policy.
3. What outcomes are intended by implementing the policy/delivering the service?			For services to reach a larger audience. For quicker information to be available to the public and staff. To promote a particular service. To increase visibility of services and promote feedback.
4. How will the above outcomes be measured?			Mainly through traffic analysis of visits to feeds and the regular service reviews of their social media strategy's
5. Who are they key stakeholders in respect of this policy/service and how have they been involved?			Homerton's services are the main stake holders with social media. We have established a social media pilot group that has met every month to reach a clear understanding of what the various services require of their social media and what it takes to keep it healthy.
6. Does this policy/service impact on other policies or services and is that impact understood?		no	
7. Does this policy/service impact on other agencies and is that impact understood?		no	

Equalities Impact Assessment Question	Yes	No	Comment
8. Is there any data on the policy or service that will help inform the EqIA?		no	
9. Are there are information gaps, and how will they be addressed/what additional information is required?		no	
Equalities Impact Assessment Question	**Yes**	**No**	**Comment**
10. Does the policy or service development have an adverse impact on any particular group?		no	
11. Could the way the policy is carried out have an adverse impact on equality of opportunity or good relations between different groups?		no	
12. Where an adverse impact has been identified can changes be made to minimise it?		no	
13. Is the policy directly or indirectly discriminatory, and can the latter be justified?		no	
14. Is the policy intended to increase equality of opportunity by permitting Positive Action or Reasonable Adjustment? If so is this lawful?		no	

EQUALITIES IMPACT ASSESSMENT
FOR POLICIES AND PROCEDURES

1.   If any of the questions are answered 'yes', then the proposed policy is likely to be relevant to the Trust's responsibilities under the equalities duties. Please provide the ratifying Committee with information (the 'form') on why 'yes' answers were given and whether or not this is justifiable for clinical reasons. The author should consult with the Director of Workforce & Education to develop a more detailed assessment of the Policy's impact and, where appropriate, design monitoring and reporting systems if there is any uncertainty.

2.   A copy of the completed form should be submitted to the ratifying committee when submitting the document for ratification. The Committee will inform you if they perceive the impact to be sufficient that a more detailed assessment is required. In this instance, the result of this impact assessment and any further work should be summarised in the body of the Policy and support will be given to ensure that the policy promotes equality.

Policy Submission Form

To be completed and attached to any policy or procedure submitted to the Trust Policy Group

1	**Details of policy**	
1.1	Title of Policy:	Social media policy for Trust staff
1.2	Lead Executive Director	Daniel Waldron
1.3	Author/Title	Director of Transformation
1.4	Lead Sub Committee	N/A
1.5	Reason for Policy	To implement safe, secure and responsible guidelines for the management of social media for Homerton staff and services.
1.6	Who does policy affect?	All staff who are involved with the maintaining of social media content for Internet/Intranet.
1.7	Are national guidelines/codes of practice incorporated?	Yes, not directly, but the sensible and good practise measures incorporated within this policy are common rules that appear in other NHS Trust policies but would be relevant to any corporation.
1.8	Has an Equality Impact Assessment been carried out?	Yes - page 13
2	**Information Collation**	
2.1	Where was Policy information obtained from?	The policy information has been created internally by Daniel Waldron, Nicholas Ward and Mark Purcell.
3	**Policy Management**	
3.1	Is there a requirement for a new or revised management structure if the policy is implemented?	No
3.2	If YES attach a copy to this form	
3.3	If NO explain why	Management structure is already in place to deal with the escalation of issues and responsibilities.
4	**Consultation Process**	
4.1	Was there internal/external consultation?	Yes, 1) external discussions regarding social media with our CMS with our web hosting company 2) external meetings with three other NHS trusts communication departments 3) internal monthly meetings with our social media pilot group to establish the needs and

		correct supervision of social media 4) Internal discussions with Director of Transformation, head of press and communications personnel in fine tuning social media responsibilities.
4.2	List groups/Persons involved	Precedent (web hosting company) Chelsea & Westminster NHS Trust (comms dpt) CLCH NHS Trust (comms dpt) East London NHS Trust (comms dpt) Service managers at Homerton
4.3	Have internal/external comments been duly considered?	Yes
4.4	Date approved by relevant Sub-committee	
4.5	Signature of Sub committee chair	
5	**Implementation**	
5.1	How and to whom will the policy be distributed?	The policy will be sent out to all staff via email, advertised and uploaded to our policies and guidelines section on the intranet
5.2	If there are implementation requirements such as training please detail?	Services will fund their own requirements and needs and the communications team will require monitoring software.
5.3	What is the cost of implementation and how will this be funded?	Monitoring software will cost approx. £500 and will come from the marketing & communication budget
6	**Monitoring**	
6.1	List the key performance indicators e.g. core standards	N/A
6.2	How will this be monitored and/or audited?	Live monitoring by the communications team
6.3	Frequency of monitoring/audit	Daily continual live monitoring by the communications team.

Date policy approved by Trust Policy Group:

.... 22/9/14 ....

Signature of Trust Board Group chair:

.... *[signature]* ....

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