NHS
Kernow
Clinical Commissioning Group

Social Media Management Policy and Guidelines

Date approved: 18 December 2019

This policy was adopted by NHS Cornwall and Isles of Scilly Integrated Care Board (ICB) on 1 July 2022.

We are working to change the branding on our policies and to make sure they are accessible.

We intend to complete this work by 1 April 2023. While this work is underway, all references to NHS Kernow, the CCG and related structures should be taken to relate to the ICB.

This policy may not be suitable for users of assistive technology. If you use assistive technology (such as a screen reader) and need a version of this document in a more accessible format, please email ciosicb.corporategovernance@nhs.net. Please tell us what format you need. It will help us if you say what assistive technology you use.

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1. Introduction

The internet can be a valuable resource which the staff of NHS Kernow Clinical Commissioning Group (NHS Kernow) may wish to access.

Social media is the term commonly used for online applications that allow people to communicate in different ways – sharing opinions and information. Social media encourages user participation and engagement, and builds online communities and networks.

Social media provides another platform with which to engage with people, promote NHS Kernow and its services, and raise awareness of specific public health campaigns. Participation in social media enables us to engage with an audience that might not be reached through traditional media such as newspapers and radio.

Examples of social media platforms:

- Microblogging – for example Twitter and LinkedIn
- Blogging – for example WordPress and Tumblr
- Video sharing – for example YouTube and Vimeo
- Picture sharing – for example Flickr and Instagram
- Social bookmarking – for example Reddit
- Social sharing – for example Facebook
- Professional sharing – for example LinkedIn
- Audio sharing – for example SoundCloud and Spotify

NHS Kernow fully supports staff in accessing social media in their private lives and at work for professional networking or other similar professional purposes. This policy is aimed at staff who use social media to represent the organisation, and wider health and care system to represent their organisation for work purposes.

2. Purpose

Using social media may result in members of staff, intentionally or unintentionally, making their connections to an organisation, professional body or their work place available to all.

NHS Kernow expects staff members who use social media to do so as public servants. They are therefore expected to behave appropriately and consistently in line with our values and policies, the NHS and any relevant professional bodies.

The internet is a fast moving technology and it is impossible to cover all circumstances. The principles set out in this document should always be followed. The intention of these guidelines is not to stop staff from conducting legitimate activities on the internet, but serves to flag-up those areas in which conflicts may arise.

3. Activities using social media

There are two main ways to use social media:

1. Create a dedicated social media presence that can be used to:

    - Enhance engagement with a target audience (for example, through privileged access to content and information, or the uploading of photos and/or video/audio content).
    - Allow followers to share experiences (for example, sharing tips on giving up smoking or eating healthier following specific campaign).
    - Promote specific events via invites and newsfeeds (for example, engagement activities, events and courses).
    - Drive traffic to NHS Kernow/Cornwall and Isles of Scilly Health and Care Partnership websites for more information.
    - Send information/support directly to public (for example, via Twitter).

2. Interact with existing external social media sites to:

    - Engage with other service providers – create a virtual network to share and share information and best practice amongst professionals.
    - Monitor what's being said online about NHS Kernow and its services, and give an authorised user the right to reply.
    - Drive traffic to NHS Kernow/Cornwall and Isles of Scilly Health and Care Partnership websites and social pages.

4. Guidelines

Any staff member wishing to set up a work-related social presence or interact with existing external sites must obtain approval from their line manager and the communications team.

The following points should be considered when using social platforms. They will help employees get the most out of social tools, whilst maintaining a safe professional environment and protecting themselves and NHS Kernow. The communications and engagement team can provide training and support for anyone who is unsure about

what constitutes safe and professional practice. Please contact one of the team to arrange training.

- **You are personally responsible for what you publish**. Remember that anything you post will be published world-wide immediately and will remain permanently available, and is likely to be republished in other media. Avoid publishing your personal contact details where they can be accessed and used widely by people you did not intend to see them, and never publish anyone else's contact details.

- **Stay within the legal framework** – libel, defamation, copyright and data protection laws apply. Also be aware of fair use and financial disclosure laws. NHS Kernow's internet and email policies must be followed at all times. Several communications and engagement team members are legally-trained journalists – always ask for advice before publishing if you're unsure.

- **Identify yourself**. Give your full name (and, where relevant, your role) when you discuss NHS-related matters, and write in the first person. You must make it clear whether you are speaking for yourself or on behalf of NHS Kernow. For approved NHS sites you should set up an official profile that identifies your role.

- **Use disclaimers**. If you publish something on any website outside of NHS Kernow that is related to the work you do or services associated with the organisation, use a disclaimer such as: "The views expressed here are my own and don't necessarily represent those of NHS Kernow."

- **Seek permission**. Always get permission to publish or report on conversations that are meant to be private or internal to NHS Kernow. Don't cite or reference anyone without their approval. If you do make a reference, link back to the original source material where possible. Never disclose commercially sensitive, anti-competitive, private or confidential information. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss this with your line manager. Advice can be sought from the communications officer for digital and design.

- **Respect your audience**. Don't use racial/gender slurs, personal insults, obscenity, or engage in any conduct that would not be acceptable in the workplace. You should also show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory, such as politics or religion.

  Add value. Provide worthwhile information and perspective. NHS Kernow's brand is best represented by its people and what you publish may reflect on that. Before you include a link to a third party website, check that any terms and conditions of that

website permit you to link to it. All links must be done so that it is clear to the user that they have moved to the third party's website. Do not post, upload, forward or post a link to chain mail, junk mail, cartoons, jokes or gossip.

- **Don't get distracted**. Ensure your online activities do not interfere with your job, your colleagues or commitments. The sites should only be used in work time if they directly support you in your employed position, and have been approved by your line manager.

- **Compliments and criticisms**. If you are made aware of any complaints or criticisms that fall outside your area, please ask the complainant to contact the complaints team, and alert the team to the incident. If you are made aware of a satisfied service user with an interesting story to tell, please inform the communications and engagement team, and your line manager if it relates to your department. Ask the person to refer any personal details about a situation via a direct message (DM).

- **Be aware of your personal profiles**. If you have your own personal social media profiles that identify you as an NHS Kernow employee, ensure your profile and related content is consistent with how you wish to present yourself to colleagues and the public. Ensure information and photographs that you wish to keep private are not available on public profiles and keep an eye on your privacy settings to make sure access to your personal sites is restricted. Never broadcast personal details such as your home address or phone numbers.

- **Cyber bullying.** Any member of staff who feels that they have been harassed or bullied, or are offended by material posted or uploaded by a colleague onto a social media website should inform their line manager who will contact either the communications officer for digital and design or the corporate governance team.

- **Quotes.** It is acceptable to quote a small excerpt from an article. However, if you think an excerpt is too big, it probably is. Quote accurately, include references and when in doubt, link, don't copy.

- **Be honest and open**, but be mindful of the impact your contribution might make to people's perceptions of us as an organisation. If you make a mistake in a contribution, be prompt in admitting and correcting it. If you feel even slightly uneasy about something you are about to publish, then you shouldn't do it. If in doubt, always discuss it with a member of the communications and engagement team first.

- **Don't escalate heated discussions**. Try to be conciliatory, respectful and quote facts to lower the temperature and correct misrepresentations. Always aim to get sensitive personal sensitive situations off line. Never contribute to a discussion if you

are angry or upset, return to it later when you can contribute in a calm and rational manner.

- **Be inclusive.** The use of social media as the sole means of contact or communication with any given group must be avoided as this may discriminate against those who do not have access to such a facility.

Whilst staff are encouraged to feel proud to work for NHS Kernow, the communication and engagement team advises that people should only identify themselves on social platforms that encourage discussion about work-related topics (such as LinkedIn or Twitter). We advise that staff do not identify themselves as NHS Kernow employees on Facebook to ensure that personal views and sharing content are not associated with the organisation. This is due to the different nature of the platforms and allows a clear divide between the employee's personal and professional life.

If you require any assistance, please contact the communications and engagement team on 01726 627800 or email kccg.contactus@nhs.net.

5. Conflicts of interest

Staff members who have or want to create an online presence (personal or professional) which indicates in any way that they work for NHS Kernow should discuss any potential conflicts of interest with their line manager in line with our existing policy e.g. in the same way staff are required to report additional work activity which may conflict with their role.

If an online site makes it clear the author works for NHS Kernow, it should include a simple and visible disclaimer such as "These are my personal views and not those of NHS Kernow".

Any staff member who is contacted by the press about posts on their social networking site that relate to the organisation should talk to both the communications and engagement department and their line manager before responding.

6. Consideration to colleagues

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 or social events with work colleagues in this way. For example, there may be an expectation, by staff present at a social event, or the organisation that photographs taken at a private staff event will not appear publicly on the internet. The

perceptions of staff or others not at the event who may see the images out of context should also be considered.

Staff should be considerate to their colleagues in such circumstance and should not post information when they have been asked not to. They should remove information about a colleague if that colleague asks them to. NHS Kernow' expectation is that information would be removed within 12 hours of the request being made.

If you become aware of an employee posting comments about you or a client of NHS Kernow, you should in the first instance contact the originator and politely request its removal. If this request is not actioned or if the nature of the information causes undue concern, please seek support from your line manager or other senior staff member. Advice and guidance in relation to disciplinary action can be accessed from HR.

7. Professional boundaries

Professional bodies and NHS Kernow have clear policies which set out the boundaries within which staff conduct professional relationships with clients. The same principles apply online.

In the event a staff member becomes aware they have befriended a recipient of current services, this should be immediately discussed with your line manager.

Engagement with clients through social media should only occur through 'fan pages' set up for this specific purpose.

If you become aware of defamatory or inappropriate posts which have been made about you by a client or family member, you should in the first instance contact the originator and ask them to remove this. If this request is not adhered to, or you feel you are being targeted in a vexatious or malicious way you should report this to your line manager or other senior staff member. Advice can also be sought from HR. Subject to the nature of the posts; NHS Kernow would consider supporting legal action to address this.

8. Online radicalisation

CONTEST is the UK strategy for countering terrorism and is divided into four strands, Protect, Prepare, Pursue and PREVENT.

Social media is an area where some people may be exploited by radicalisers. This may lead to them entering into dialogue and communication or being drawn into terrorism or violent extremism. This includes groups focused on a single issue such as animal rights or the environment.

PREVENT aims to stop people becoming terrorists or supporting terrorism. If you are concerned about a fellow member of staff and information they are posting online which may relate to extremist views or affiliations, you should raise your concerns in line with our adult safeguarding policy.

9. Use of social media during working hours

NHS Kernow promotes responsible use of internet access during working hours as set out in the acceptable use policy. All staff must be mindful of the impact of additional internet use on our network and functionality of other IT systems/programmes e.g. Outlook. Good public and professional perception of our staff is vital.

10. Social media and NHS Kernow

NHS Kernow has a social media presence and will support teams who wish to use this forum as a way of engaging with clients and the public.

Please contact the communications and engagement team to discuss your requirements and ensure appropriate procedures are put in place to allow timely responses to be provided to members of the public linking into the service through this forum.

Any online activities associated with the work of NHS Kernow should be discussed and approved in advance by the communications officer (digital and design).

11. Social media pages and groups that promote or support our services

We recognise the importance of the internet in shaping public thinking about NHS Kernow and our services, employees and partners. We also recognise the importance of our staff joining in and helping shape health service conversation and direction through appropriate interaction in social media. Therefore we will support the use of social media for these purposes, provided the standards and procedures below are followed.

- When a department or service is considering the creation of a social media page or group for the promotion, support, or publication of goods, services or functions of the organisation, they must first consult with the communications officer for digital and design.

- The person proposing the introduction of this social media presence must submit to the communications officer for digital and design a written plan detailing the reason and need for the project, the methods which will be used to manage the page/group, how the security of the page/group will be maintained and the expected life span of the site.

- This document will be reviewed and retained by the communications officer for digital and design and only after approval can the group or page be created. Names of page/group administrators must also be submitted to the communications officer for digital and design for administrative purposes.

- When the need for an approved social media site or page no longer exists, for instance following the closure of a service or initiative, the page/group must be removed from publication.

- Social media pages and groups which have not followed the above approval process must not use the NHS Kernow name, logo, or any registered trademarks, or purport to have sanction or approval of the organisation.

- When posting to an approved group or page, extreme care must be taken when making comments about the goods/services provided by a third party, especially when providing a hyperlink/link to another site. It is the responsibility of the individual proposer identified to ensure that the link is valid, and the content of the site and the goods/services provided by the third party will not bring NHS Kernow into disrepute.

- Where an image, document, video or audio recording of any individual, organisation or service is to be published via an approved social media page or site, the consent of the copyright owner must be obtained and forwarded to the communications and engagement team.