

Social Media Policy

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Services	Applicable
Trustwide	x
Mental Health and LD	
Community Health Services	

				<p>guidance</p> <p>Appendix B Added Social Media Playbook</p> <p>Appendix C Added slidedeck for presentation to staff interested in scoping using social media platforms for their client group</p>
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Social Media Policy

1.0 Introduction

- 1.1 The purpose of this policy is to ensure a consistent approach to the use of social media is employed across the Trust.
- 1.2 ELFT is keen to encourage staff to use social media in a confident coherent way. Information is often considered more credible when it comes from actual people - like our staff. It is important that staff are aware what they can and cannot share, how to get the most from social media, and what actions to take in the event of a mistake or if they come under attack (by trolls or hackers).
- 1.3 Guidelines for functioning in an electronic world are the same as the values, ethics and confidentiality policies employees are expected to use every day, whether on social media or talking with service users and their families.
- 1.4 Many stakeholders (service users, carers, partners and staff) use social media as a way to interact with others, find out information and leave feedback. In order to ensure the Trust is able to communicate and engage with stakeholders who use social media, corporate accounts are managed and monitored by the Communications team on behalf of the Trust.
- 1.5 The Trust recognises that many staff use these channels in their own time, using their own computers and smartphones. In addition to personal use, for many, this is an important channel for professional communication, learning and gaining a work profile. This policy confirms that every staff member has permission to use social media at work in line with IT guidance on 'reasonable' use.
- 1.6 This policy provides guidelines about use of social media within the Trust as a communications tool for the Trust and by staff members in their professional capacity. This policy has been developed based on best practice from NHS Employers, Nursing and Midwifery Council, Royal College of Physicians and Royal College of Psychiatrists. This is a rapidly changing area and this policy will be updated as social media channels and any developments relating to these evolve.
- 1.7 Explanation of Terms and Definitions

Social media: In this policy, social media refers to using tools such as Facebook, Twitter, YouTube, WhatsApp, LinkedIn and Instagram. They are used for social and professional networking, are mobile and are instantly available on any number of devices including personal computers, tablets, smart watches and smartphones.

Trolls: A troll is a user who posts content, or engages in separate conversations, with the chief intention of offending or abusing other social media users

Tweets: Comments made on Twitter

Hacker: Someone who seeks and exploits weaknesses in a computer system security, computer programme or computer network

2.0 Trust use of social media to support communications with stakeholders

2.1 East London NHS Foundation Trust uses the following social media platforms to communicate with patients, the public, staff and the media:

- Twitter @NHS_ELFT
- Facebook East London NHS Foundation Trust
- YouTube NHSELF
- Vimeo <http://vimeo.com/user28245093>
- LinkedIn
- NHS Choices/Patient Opinion

These accounts are managed by the Communications team on behalf of the Trust.

2.2 ELFT's social media accounts are monitored during office hours: 09:00–17:00, Monday – Friday, excluding public holidays. Occasionally events maybe be reported on outside of these hours live on social media platforms.

2.3 From time to time social media services such as Twitter may be unavailable. The Trust accepts no responsibility for lack of service due to social media service downtime.

2.4 By sharing other social media users' content, ELFT does not endorse the information or others' views of that organisation or individual. ELFT will aim to share information which adds to any debate or topic we are involved in.

2.5 If a Trust team or service wishes to set up a social media profile specifically outside of the main Trust accounts, permission must be requested from the Communications team. Guidance for staff is shared in Appendix A of this policy.

3.0 Staff use of social media platforms

3.1 As Trust employees, staff are required to maintain standards of professionalism and may be held to account in accordance with the Trust's Disciplinary Policy for any inflammatory, derogatory, slanderous or abusive statements posted.

3.2 Staff members are encouraged to 'follow' colleagues and comment on posts, retweet them or 'like' them, either in support or to question or pose a challenge.

3.3 The following social media websites are accessible from Trust workstations, Smartphones and tablets:

- Twitter
- Facebook
- YouTube
- Vimeo
- LinkedIn
- Instagram – by arrangement with specific teams

Some new social media channels are gaining audiences such as Quora and WhatsApp Broadcasting. The Trust will consider the application of these if they have a place in advancing ELFT messages.

Staff who feel the use of social media channels could add significant benefit to the breadth of their work and engagement with service users and the public should contact the communications team to scope this. It is advisable to check with the service manager first before proceeding.

3.4 The Trust provides guidance to staff about the use of social media in the Induction training received by all new staff. A bespoke social media presentation and session is also available to teams on request. This gives an overview of social media for novices, and space for questions and queries. (Appendix 2)

3.4 All staff using social media in their workplace should consider the following guidance:

- Patient confidentiality should be upheld rigorously. Staff must ensure they do not breach any individual's right to privacy and that ELFT policies relating to confidentiality and governance are upheld. This includes photographs where consent to take the photo and post it should be sought. Care should be taken when taking photographs to ensure that there is no person identifiable information in the background on whiteboards or visible files.
- Staff should not use social networks to build or pursue relationships with patients and service users as this can blur important professional boundaries. It is important to be aware that even without engaging with patients or service users on social media, members of the public may still be able to access information about individual staff if their privacy settings enable this
- The Professional Boundaries Policy sets out expectations around staff behaviour in all interactions with service users
- If a patient contacts a member of staff about their care or other professional matters through their private profile, the staff member should indicate that they cannot mix social and professional relationship and, where appropriate, direct them to the person's GP, their service generic email or access information from a reliable source such as NHS Choices.
- Where a member of staff identifies themselves as an employee of the Trust in their social media activities, the tone and content of posts should uphold the Trust's values of care, respect and inclusivity and uphold the reputation of the Trust.
- Staff should check social media guidance issued by their professional bodies to ensure they abide by these and uphold the profession's values* Staff should be wary of making any potentially libellous statements about others, and only post information that is accurate and will stand up to scrutiny.
- If a staff member is uncertain about posting some information, they should probably not do so. They should contact the communications team for advice.
- Never post, 'like' or share offensive material on an ELFT online platform
- Never use a professional Trust social media account to promote or discuss politics.
- Social media is about engagement so an informal conversational style is suitable for these communication channels.

3.5 The Trust does not support or endorse the use of WhatsApp for any communication involving the use of personal identifiable information relating to service users or any Trust-related business.

- 3.6 Instead, 'forward', an NHS system of messaging (Whatsapp for the NHS) is to be rolled out for staff to use to swap shifts, to communicate when extra shifts are available, to fill uncovered shifts, or in the event of a major incident when staff may be urgently required to come into the workplace.
- 3.7 The rollout of 'forward' will allow ELFT to stop using WhatsApp for work purposes, as WhatsApp is not GDPR compliant and is unsuited to NHS work (as it's not password protected and the data is stored on Facebook servers in the US).
- 3.8 Any staff member who posts information on an open forum that identifies a service user even to use their initials is breaching the NHS Code of Confidentiality. This will be subject to investigation and possible disciplinary action. The Trust could be sued by the individual and/or fined by the Information Commissioners Office and risk affecting ELFT's reputation and the public's trust.
- 3.9 Recommendations of the Savile Inquiry: Recommendation 9 of the Lampard Report states: *'All NHS hospital trusts should devise a robust trust-wide policy setting out how access by patients and visitors to the internet, to social networks and other social media activities such as blogs and Twitter is managed and where necessary restricted. Such policy should be widely publicised to staff, patients and visitors and should be regularly reviewed and updated as necessary.'* In response, ELFT will publicise on its website and where possible, in public areas, its social media policy.
- 3.10 Should evidence be brought to the attention of ELFT or the Communications team of public breaches of patient confidentiality, bullying and harassment and any other potential breaches of the law, the team will contact the author to remove the offending post, report this on Datix and/or liaise with the legal department and police liaison manager to take further action. A Disciplinary investigation will follow.
- 3.11 Using social media to whistleblow without already having raised concerns through ELFT's internal channels would not normally be considered appropriate. Information about how to contact the Freedom to Speak Up Guardian is widely available on the intranet, or concerns should be raised directly with a senior member of staff.

4.0 Encouraging staff to join social media channels

- 4.1 The Trust is keen for staff to join social media platforms to comment on health and social care discussions. They will stimulate the spread of news and increase the breadth of the Trust's reach to increase engagement with new audiences.
- 4.2 A 'Join the Conversation' poster has been produced to indicate social media adoptees on the executive team so that staff can see their twitter handles and follow, retweet or comment on posts.
- 4.3 The communications team can be invited to join team meetings to conduct a presentation about social media to support staff who are not confident and to provide advice and tips.

5.0 Managing mistakes, negative comments and trolling

- 5.1 If a staff member inadvertently makes an inaccurate or misleading statement, it is important that they acknowledge this, apologise and publish correct information.
- 5.2 Where a social media user is abusive in response to a posting by a staff member, the staff member should seek advice from the Communications team. The Communications team will intervene when aware of negative comments or feedback expressed online, and seek to engage with the individual and signpost them to PALS or the Complaints team. Where comments expressed are defamatory, abusive, or breach the privacy of a third party, the Communications team will intervene and try to resolve by communicating privately/off-line with the author.
- 5.3 If a social media poster is persistently personal or abusive, the Communications team will develop a phased management plan depending on the type of issue, to support the individual/service, and to manage the organisation's reputation. This will include private messaging the individual to take the discussion off-line. For complaints, individuals should be directed to contact the PALS and Complaints team to discuss their issue in more detail. This will indicate to other social media users that the organisation has made efforts to engage with the individual. If the content is more concerning, speak to the communications team and/or the legal team about further action.
- 5.4 If a Trust social media platform is hacked into or has posts not authored by the team, contact the communications team or IT team straightway for advice.

6.0 Non compliance

- 6.1 East London NHS Foundation Trust policies apply to all forms of communication, whether verbal, printed or online.
- 6.2 Non-compliance with ELFT policies may lead to disciplinary action in accordance with the East London NHS Foundation Trust Disciplinary Policy.
- 6.3 Staff are also reminded that actions online can be in breach of the harassment/IT/equality policies. Actions that may be viewed as harming the Trust's reputation may be treated as conduct issues in accordance with the Trust's Disciplinary Policy and may result in dismissal.
- 6.4 The process for staff raising concerns at work/ whistleblowing is set out in the Staff Concern at Work/ Whistleblowing Policy. It is important that concerns are raised and reported but social media platforms should not be used to raise such concerns. Staff should contact the Freedom to Speak Up Guardian for further advice.

7.0 Using Social Media as a Paid For Marketing Tool

- 7.1 Paid social media advertising is a method to target specific group(s) with adverts on social media channels such as Twitter, Facebook and Instagram. Pay-per-click is the process where the advertiser (e.g. service) pays the publisher (e.g. Facebook) for each click made on the advert.

7.2 This could be helpful to services keen to target hard-to-reach groups, or people who are searching particular areas on the internet who might benefit from ELFT service. It can generate referrals and raise awareness of Trust services.

7.3 Services should contact the communications team for assistance should they be interested in paid social media advertising.

8.0 Accountability and responsibilities

8.1 Overall accountability for this document lies with the Director of Communications.

8.2 All staff are responsible for adhering to this policy when using social media platforms and for following the guidelines in Appendix A when setting up a social media account on behalf of a Trust service.

9.0 Monitoring and review

9.1 The Communications team monitors performance indicators (e.g. number of followers) and captures feedback via the corporate social media channels to support patient experience activity across the Trust.

9.2 This policy and guidance will be reviewed on a bi-annual basis, and additionally reviewed as required in relation to: legislative changes, good practice guidance, case law, significant incidents reported, new vulnerabilities and changes to organisational infrastructure. If this results in any changes, the document will be amended. Otherwise this document is scheduled for a bi-annual update.

10.0 Useful Information

Nursing and Midwifery Council. Social Media Guidance

<https://www.nmc.org.uk/standards/guidance/social-media-guidance/>

Royal College of Physicians. Social Media Highway Code

<http://www.rcgp.org.uk/social-media>

NHS Employer's social media guidelines

<https://www.nhsemployers.org/yourworkforce/need-to-know/social-media-and-the-nhs/social-media-guidelines>

Social media and attributed digital content policy (NHS England)

<https://www.england.nhs.uk/wp-content/uploads/2018/04/social-media-policy.pdf>

Using social media in leadership

<https://www.nhsemployers.org/case-studies-and-resources/2017/06/using-social-media-in-leadership>

NHS identity guidelines- the guidelines apply to all NHS branded sites in England,

<https://www.england.nhs.uk/nhsidentity/>

BASW Code of Ethics: <https://www.basw.co.uk/about-basw/code-ethics>

Royal College of Occupational Therapy Standards and Ethics

<https://www.rcot.co.uk/practice-resources/rcot-publications/downloads/rcot-standards-and-ethics>

Chartered Society of Physiotherapy

<https://www.csp.org.uk/publications/code-members-professional-values-and-behaviour>

British Association for Counselling and Psychotherapy

<https://www.bacp.co.uk/media/6305/bacp-managing-confidentiality-legal-resource-gpia014-july2019.pdf>

British Psychological Society

<https://www.bps.org.uk/psychologists/standards-and-guidelines>

ELFT Professional Boundaries Policy

https://www.elft.nhs.uk/uploads/files/1/Professional_Boundaries_and_Relationships_at_Work_Policy.19.12.2017.pdf

Appendix A

Guidance for teams/ services requesting social media presence

1. Setting up a social media profile outside the Main Trust Accounts Permission

1.1 Before establishing a presence on any social networking platform you should contact the Communications team, outlining how this activity will benefit the programme, service or business area and the benefits to be realised, compared to the costs in time and resources in doing so.

1.2 The Communications team will provide advice on areas for consideration such as: management, time and resources and timeframes, risks and issues, exit strategy, how to link this activity to the overall business plan for a programme or business area and stakeholder consultation and approval.

1.3 Given the time and resources involved in effectively managing a social media presence, there must be a clearly evidenced demand from an audience for engagement activity using a particular channel, rather than engagement using existing online networks.

1.4 You will be committed to update and monitor you social media accounts during office hours Monday to Friday between 9-5.

1.5 Once it has been agreed with the Communications team that your team/ service will have a separate social media presence you will need to set up the relevant account, user name and password. The Communications team should be advised of these. Please note that any changes to log in details should be reported to the Communications team immediately.

1.6 The Communications team will help promote the individual channels and work with the team/ service to agree the communications plan for this.

1.7 If you wish to set up a blog to write in your capacity as a Trust employee, then please discuss your proposal with the Communications team in the first instance. They will provide you with advice on how to take this forward.

1.8 Opportunities occasionally arise for employees to blog, in an official capacity, on alternative platforms or websites. To ensure that they are appropriate, and provide benefit to the organisation, these opportunities must be discussed and agreed with the Communications team.

1.9 Video and media file sharing is an excellent medium for providing stimulating and engaging content, which can potentially be seen as many people as it is easily shared on social media sites and embedded on other people websites.

1.10 To reach the widest audience it is important that East London NHS Foundation Trust, all public video content is placed on the Trust's Youtube and Vimeo channels from where it can be shared, embedded on the Trust owned websites, microsites and those owned by others.

1.11 You must ensure that all video and media (including presentations) are appropriate to share/publish and do not contain any confidential, commercially sensitive or defamatory information. You must also ensure that the written consent forms are obtained before any material can be published on these channels.

1.12 If the material is official and corporate, East London NHS Foundation Trust content must be branded appropriately and be labelled and tagged accordingly. It must not be credited to an individual or production company.

1.13 As an organisation we have a moral and legal responsibility to ensure accessibility guidelines are met and that we provide material that is usable by all, regardless of disability or access to the latest technology. For further guidance on appropriate multimedia formats, legal and accessibility considerations contact the Trust's Communications team

1.14 If you wish to run an online survey please contact the Communications team. It is important that the Trust takes a joined-up approach to contacting stakeholder groups, so survey activity may need to be considered in the context of other pieces of work.

1.15 If you wish to participate in online collaboration using externally facing web based tools with NHS colleagues or suppliers on East London NHS Foundation Trust projects and documents you must carefully consider security. In the majority of cases, when involved in collaborative working, discussion and the sharing of work related information and documents must take place in a closed environment, behind a close and secure login, to minimise the risk of unapproved or commercially sensitive material reaching the public domain.

1.16 All information stored on internal or external websites must be held in accordance with the East London NHS Foundation Trust Information Governance Policies.

1.17 The Communications Team will provide guidance and training to empower staff to interact online in a way that is credible, consistent, transparent and relevant.

1.18 Please note that the Trust reserves the right to close any of the accounts e.g. if the volume and quality of user engagement is low or if the content is inappropriate.

2. Further information and assistance

2.1 The Communications team are available to give help and advice and should be consulted in the early stages of the planning process.

3. Monitoring and review

3.1 Performance against Key Performance Indicators will be reviewed on an annual basis and used to inform the development of future procedural document.

Appendix B

Social Media Playbook

This playbook explains how ELFT staff and services can get the most out of social media.

The Trust uses social media as one of its tools to connect with colleagues, service users and stakeholders – and staff and services are encouraged to do the same.

If you want to get in touch with us about anything you read here, tweet @NHS_ELFT or email elft.comunciations@nhs.net

[You can download the Social Media Playbook here](#)

Appendix C – Slides for Team Training

Social Media

How to get the most out of social media

We care We respect We are inclusive

What can social media do for us?

- Engage with people (patients/carers/professionals/public)
- Ask views
- Announce changes
- Promote initiatives/service
- Respond to feedback and explain
- Recruitment

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ELFT Accounts

Platform	Name
Twitter	@NHS_ELFT
Facebook	EastLondonNHSFoundationTrust
YouTube	NHSELFT

Your content could go on the Trust accounts

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What channels are you using?

- Do you use social media?
- What platforms do you use?
- Are you using them professionally or personally? What do you think is the difference?

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Types of social media

Platform	Benefits
Twitter	Fast news Short term engagement Good for customer service
Facebook	Good for community, discussion and debate
YouTube	Video hosting
Instagram	Photo hosting Younger audience
LinkedIn	Recruitment Networking Personal branding

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What to do before you begin

- Decide on your goals
 - Educating people
 - Promoting your service
 - Customer service
 - How will this help service users or the public?
 - How will this help your service?

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What to do before you begin

How will you maintain your account?

- How will you keep your account active?
 - How many times will you post?
 - Who will post?
 - How many times will you monitor and reply to posts?
 - Who will monitor the account?

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What to do before you begin

Who are you talking to?

- Who is your audience?
 - Do they use social media?
 - Which channels do they use?
- How will your audience know about your account?
- Are any other accounts doing what you want to do?
 - What do you like about them?

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Five top tips for good content

1. It's accurate
2. It's interesting for your audience
3. It's relatable and human
4. You're providing expertise
5. Include media – a photo, video, hashtag, link

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What else to consider

- Tone of voice – corporate or personal
- NHS reputation
- Humour – with care
- Small but often
- Include a call to action
- Maintain patient confidentiality
- Make a mistake? Admit it and move on

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What else to consider

- Give the communications team admin rights as a back up
- Be proactive – is there a hashtag, or story you can use to share your content?
- Do not be political – the NHS needs to remain neutral

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Planning

- Use a content planner to prepare your content
- Use hashtags # to promote your content
- Monitor and reply to messages – use the complaints procedure if needed
- Use reporting and analysis features

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