

Board and CHCs in Wales:

Social media policy

December 2020



This policy applies to Board and CHC staff and members. It is based on the policy adopted by Powys teaching Health Board for use by all its employees.

If you are unsure about any of its contents, please contact your Chief Officer.

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Introduction

Our CHC movement is making increased use of social networks to communicate with people, community groups and networks and partners. We use it to share messages about the CHCs, our role and activities and to hear from people directly about their views and experiences of healthcare in Wales.

With its use, we all have a responsibility to make sure we maintain our operational effectiveness, the security of personal data and our reputation.

This policy governs the conduct of all staff, board and volunteer members (including contractors, agency and temporary staff).

It aims to make sure staff and members are aware of their personal responsibilities for appropriate use when using social media in the conduct of CHC business.

Purpose

This policy aims to:

- empower and support staff and members in making effective and appropriate use of social media tools as an increasingly important part of their work to communicate and engage;
- help staff and members get the best out of the tools available whilst maintaining a safe professional environment and protecting themselves as well as the Board and CHCs;
- provide guidance to staff and members on their personal responsibility as an employee/member when using any social networking site;
- make staff and members aware of the issues relating to the use of social media for both private and CHC purposes;
- provide staff and members with information to consider before participating in or developing any new social media application;

- ensure staff and members are aware of relevant legislation and standards in relation to the publishing of information online, including codes of practice issued by professional and regulatory bodies and the implications of using social media inappropriately;
- to provide direction on further advice and information.

Scope and application

This policy applies to all CHC staff, board and volunteer members (including contractors, agency and temporary staff).

It sets out staff and member's responsibilities when using social media and the implications involved. It is intended to outline areas of good practice and illustrate where challenges can arise for individuals and the CHC movement.

It applies to the use of social media for CHC and personal purposes, both at work and outside of the work environment; i.e. in one's own time, using one's own or CHC equipment and personal or organisational social media accounts or identifiable internet presence.

For the purposes of this document it should be understood that the term social media refers to all internet social networking and media sharing sites, (such as Facebook, Twitter, YouTube, Snapchat, Instagram, Flickr etc.) and to all 'blogs', 'chat', on-line commentaries, diaries, discussion forums, 'wikis' and sites allowing the posting of user generated content for mass consumption.

Principles

The CHC movement recognises the role and value of social media as a means of communication and of improving the way it reaches out and interacts with different communities internally and externally.

It also has a duty to protect people from the potential risks around its use. These risks need to be identified and managed so that the

benefits of social media can be realised in as safe a manner as possible.

Our CHC movement acknowledges everyone has a right to express themselves using social media. It also recognises its role in offering advice on safe use of social media and highlighting the responsibility of individuals to be aware of the potential consequences of posting content on to publically accessible platforms.

The blurring of boundaries between a person's private and CHC role on social media is recognised and it is important that staff and members understand and are mindful that inappropriate use could damage their own reputation as well that of others, including family, friends and colleagues and the CHC movement. CHC staff and members have a responsibility to adhere to this national policy.

Good practice

Here are some key points and advice to consider when using social media in a personal or CHC capacity. More detailed advice is available in appendices A and B.

Be yourself – identify who you are and whether you are speaking on behalf of the CHC, if commenting in a personal capacity make sure that it is made clear the views are your own.

It is a public space – remember that by posting information online you are publically publishing that content and it will be available to a wide audience. Even when posting to 'closed' or 'private' groups that information can be copied, shared and used by others in ways you may not have considered. Never say anything that you wouldn't stand up and say in a public meeting.

Respect others – adhere to the values and principles around respect and dignity championed by the CHC movement. Rules around bullying and harassment are as valid online as they are in the physical world. Consult CHC policies and codes of conduct for more details. Do not post pictures or information about others

without their consent. Do not publish obscene words, pictures or videos.

Respect yourself and your organisation – whether you are clearly identified in your CHC capacity or not, your words and actions online can act as an ambassador for the CHC movement. Do not post anything that would bring yourself or the CHC movement into disrepute. There are many channels to share grievances and raise concerns and they should be used appropriately.

Respect patients and clients– the strict and legal obligations around patient/client confidentiality extend to the online world both when using social media for private and CHC use. Never post any information that could breach these rules.

Do it right – do not begin or set up any CHC related social media account without first consulting with your chief officer and securing its support. There are rules and governance arrangements in place to make sure standards are consistent and the staff, members and the CHC movement is properly supported and protected.

All Board and CHC staff and members have a responsibility to be aware and to follow this policy. Online activity is governed by the same rules, policies and procedures around behaviour and conduct.

Appendices A and B provide guidance on use and unacceptable behaviours.

Any CHC staff or members who are in any doubt about what they should or should not post on social media sites – particularly about their CHC activities – or who discover online content that may harm the reputation of the CHC movement, should contact their CHC or Board Chief Officer/Chief Executive.

Business use of social media

Business use of social media may include:

Creating and/or managing content on a social media site created, branded and managed by the CHC movement;

- participation in third party professional forums and/or discussion boards relating to CHC activities;
- the monitoring of social media for CHC purposes.

Local restrictions are generally in place to ensure that only those members of staff and members having a genuine need are given access to CHC social media pages in order to issue CHC statements and update content. Anyone wishing to develop a social media site or application on behalf of the CHC should speak to their CHC Chief Officer in order for them to provide advice and guidance on the local approval process.

Anyone speaking in any kind of CHC capacity or deploying social media on behalf of a CHC or the wider CHC movement has a responsibility to conduct themselves in an appropriate manner, as they should when addressing the media or any public meeting or forum.

Staff and members are encouraged to participate in or contribute to forums relating to CHC business. Where an employee or member is called upon to publish content in a CHC capacity on a social media web site, the following guidelines apply:

- Before participating, approval should be sought from your Chief Officer;
- you should clearly identify yourself as a CHC representative;
- you should only provide information about your location if it is absolutely essential;
- be professional - make sure you are seen to act in an honest, accurate, fair and responsible way at all times;
- obtain appropriate permission to publish any information, report or conversation that is not already in the public domain;
- do not cite or reference colleagues, partners or suppliers without their approval;
- respect copyright when including or linking to images or other material.

In addition staff and members should never:

Mention **any** information relating specifically to an individual patient or client or other member of the public where there is any possibility that that individual can be identified, unless written consent has first been obtained from the data subject or their appointed representatives;

- endorse or appear to endorse any commercial product or service;
- voice political opinion in the course of their CHC work/capacity.

Personal use of social media

The personal use of social media is a common part of day to day life for many people. Some are rightly proud to be CHC staff or members and may actively use social media as part of their professional development or highlight their role as part of their online biography.

It is important for individuals to understand their role as ambassadors for the CHC movement and to be conscious of the impact of their actions and words online which may negatively impact on the reputation and trust of the public.

The relationship with social media changes as soon as staff or members identify themselves or are identified as staff or members of the CHC movement. In these circumstances they must make it clear that any views and opinions are personal and not necessarily those of their employer.

As staff and members it is important to remember that expressing views or commenting on content on the internet in relation to the CHCs cannot be divorced from our 'working' life. Unguarded comments in relation to our activities, working environment, colleagues, patients, clients, carers, visitors, suppliers and contractors etc. can bring the CHC movement into disrepute and

may invite legal action against both the individual and a CHC/Board.

Where the CHC site uses public Wi-Fi (wireless fidelity network) staff are encouraged to use their own personal device to use any social media channels they wish to access. Personal use of social media, should not be allowed to interfere with the performance of one's duties and any such access should occur during breaks or outside of normal working hours.

Harassment, bullying and 'trolling' on social media

If staff or members believe they are being harassed, bullied or victimised as a result of another staff/members post to an internet site, they can take action. Staff should access bullying and harassment policies which outline the informal and formal action that can be taken. Members should access the code of conduct and complaints procedures which outline the actions that can be taken

Alternatively, staff can inform their line manager or an adviser in HR, or report the incident to the police or to the social media site. CHC members can inform their Chief Officer and Board members can inform the Chief Executive.

An unwelcome trend in social media is trolling – where someone looks to upset and provoke an argument by posting inflammatory statements. This is an offence under the Malicious Communications Act 1988.

If you are being targeted by a troll do not respond. You can report their behaviour via the social media site or through the police. Contact your Chief Officer (the Chief Executive or if you are a board member or staff) for advice and support.

Public use of social media

Visitors are free to use social media while on CHC sites and are supported in this by the availability in many places of free WiFi facilities.

However, whilst on CHC sites they are asked to be mindful of the dignity of the public and staff. They should not take photos of others or post their names and or other details online without their express permission.

Failure to treat others in this way and to show respect for the rights of others will result in action being taken in the same way as any other inappropriate behaviour.

User responsibilities

In order to minimise the risks inherent in using social media, to avoid loss of productivity and to ensure that adequate IT resources are available for CHC business, all staff and members are expected to adhere to this policy.

Monitoring and compliance

The CHC movement reserves the right to monitor internet traffic using its network infrastructure.

In addition, staff, members and contractors are encouraged to report any contravention of this policy that they become aware of to their Chief Officer (or Chief Executive where appropriate).

It is the responsibility of the appropriate line manager to investigate any reported breaches by CHC staff and these will be dealt with in accordance with the All Wales Disciplinary Policy.

Where a CHC or the Board considers material published by staff or members in a personal capacity on social media sites to be in contravention of this policy then it may:

- ask for the material to be removed;
- undertake an investigation into the facts, seriousness and implications of the publication which may result in disciplinary action (in line with the relevant disciplinary policies);
- report the individual to the relevant legal authorities.

Depending on the individual circumstances of the case, failure to adhere to this policy may lead to disciplinary action up to and including dismissal for staff or members. Staff and members are also advised that the following action may be taken by third parties:

- A breach of the law may lead to criminal prosecution.
- A person or company may take civil action and sue an individual for damages if defamation of reputation can be demonstrated.
- Harassment is a criminal offence for which the harasser can be imprisoned. Victims of harassment may also be able to claim damages from the harasser.
- A copyright owner may sue an individual for damages in the event of breach of copyright.
- Accessing and transmitting sexual material may be a criminal offence. The courts may take action against individuals where appropriate.

This is not a complete list and there may be other actions not shown above.

Additional matters

Use of the Welsh Language

All Board and CHC social media channels must comply with the Welsh Language Standards as well as all relevant CHC Welsh language CHC policies and procedures.

Training

Training relating to this policy must take place during the induction programme for new staff and members or as part of refresher training at least every two years.

Definition and terms used

Definitions of many of the terms used in this policy are contained in Appendix C.

Review and revision arrangements

Maintenance of this policy

This document is issued and maintained by the NHS Wales Informatics Service (NWIS) on behalf of Powys teaching Health Board, following approval by the Information Governance Board and Welsh Partnership Forum.

This policy will be subject to regular review as agreed by the Information Governance Board and the Welsh Partnership Forum. It will also be reviewed on an adhoc basis particularly where they are affected by major internal or external changes such as:

- Legislation;
- Practice change or change in system/technology;
- Changing methodology.

The Board of CHCs will review the policy at least annually so that CHC relevant aspects properly reflected.

Appendix A –Guidance on the use of social media sites

This Guidance should be read in conjunction with the Social Media Policy.

- Always read the terms and conditions to understand what you are signing up to. If in any doubt seek the advice of your Chief Officer (or Chief Executive in the case of Board staff and members).
- Restrict the amount of personal information you post online to an absolute minimum and make use of site security settings to hide any information required by the site but not essential to your use of the site.
- Use a unique complex password to log into the site.
- Remember that you are personally responsible for anything you post online.
- Restrict from public view comments made on your profile page until you approve them, bearing in mind that you may be liable for the comments of others appearing on your profile.
- Never comment with anything that you would not wish others to hear.
- As with any other medium, do not give out any information about staff, contractors, patients, service users or other potentially confidential information on social media. CHC correspondence must be made using internal channels (e.g. email) where an internal user can be verified via the internal address book.
- Do not send personal or other sensitive information via a social media site.
- If you are subject to a social engineering, hacking, virus intrusion or blagging incident in a work capacity and on a work social media channel you must report this immediately to your Chief Officer and to the CHC Board.

Appendix B – Unacceptable use of social media

Staff or members should **never**:

- divulge or share confidential or personal identifiable or sensitive information in relation to patients, clients, carers, staff or members;
- post any material or information that may undermine the dignity or be detrimental to the care and well-being of, patients, clients, carers, staff, members or others;
- post any material that represents an invasion of patient, client, staff or member privacy;
- post inappropriate comments about patients, clients, staff, members or others – this includes discussion of CHC-related issues, conversations about patients and complaints about colleagues;
- use social media to bully or intimidate a member of staff or member;
- post any material that falsely or misleadingly represents the views, standards or performance of the CHC movement;
- claim to speak on behalf of the CHC movement, the Board or a CHC without appropriate approval;
- publish any material, including images that have been obtained during the performance of CHC duties, without appropriate approval;
- use social media in any way which brings the CHC movement into disrepute;
- use defamatory, obscene, hateful, pornographic, violent, terrorist, racist, sexist, homophobic, transphobic or otherwise illegal, offensive or discriminatory language or material;
- make comments that can be interpreted as defamatory, demeaning, inflammatory, indecent or unlawful;
- use social media in any way which is illegal;
- accept a 'friend' request from a patient or client (or their family member) who is **only known** through their CHC activities;
- use their CHC email address as part of a personal login / registration on a personal site.

Appendix C - Definitions

Social media: Websites and applications that enable users to create and share content or to participate in social networking. [Oxford English Dictionary]

Social networking: The use of dedicated websites and applications to interact with other users, or to find people with similar interests to one's own. [*Oxford English Dictionary*]. Examples include Facebook, Bebo, Myspace, Twitter and LinkedIn.

Social engineering: Obtaining information by masquerading as a person with a bona fide interest in that information (e.g. a member of an organisations staff) by use of social skills.

Blagging: Obtaining information on another person, usually by assuming a false identity, without that other persons knowledge or consent.

Note: Social engineering and blagging are sometimes interchangeably used in the wider sense of obtaining information to hack systems or phone services; or to fool people into disclosure of any related information by trickery)

Blogging

A personal website or web page on which an individual records opinions, links to other sites, etc. on a regular basis. [Oxford English Dictionary]

Micro-blogging or tweeting

A social media site to which a user makes short, frequent posts. [Oxford English Dictionary]