Social Media Policy

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Directorate responsible for document:	Office of the Chair & Chief Executive
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Policy Checklist

Policy name:	Social Media Policy
Lead Policy Author & Job Title:	**Jessie Weir, Digital Communications Officer**
Director responsible for Policy:	Ruth Rogers, Head of Communications
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Equality Screened by:	**Vivienne Toal, Director of Human Resources & Organisational Development**
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Policy circulated to:	Eg Directors, Assistant Directors, Heads of Service for onward distribution to line managers, Global email, Staff Newsletter
Policy uploaded to:	Eg SharePoint, Trust website

Version Control

Version:	**Version 2**		
Supersedes:	**Social Media Policy – June 2014**		
Version History			
Version	**Notes on revisions/modifications and who document was circulated or presented to**	**Date**	**Lead Policy Author**
Version 2	The policy has been broadened in recognition of the significant development of social media and how when used appropriately, it is a very effective communications tool. The new version includes the use of additional Social Media platforms. A section has been added on video and media sharing and also Safeguarding for both staff and service users.	13/06/2022	Ruth Rogers, Head of Communications

Contents

1.0 Introduction

Social media is a form of digital marketing and communication that is direct, personal, instant and responsive. Social media provides many opportunities to improve the way we target, communicate and interact with the different communities we serve. Southern Trust uses these platforms for open and transparent engagement with stakeholders and service users.

There are a number of risks and issues to consider when using social media platforms, both for individual employees and the organisation. These risks need to be identified and managed to ensure the benefits can be realised in as safe a manner as possible.

Outside the workplace, social networking sites are used by many people to keep in touch with friends and colleagues. Every day, people talk online about Southern HSC Trust. Each individual therefore has the potential to be an ambassador for the Trust, regardless of what part of the organisation they work in.

Guidance is provided to ensure staff act in a positive way and avoid actions that may negatively affect the reputation of the Trust or leave themselves open to allegation. The guidance within this policy applies to all social media channels, not just those specified here.

2.0 Purpose and Aims

- Help protect the organisation and your personal interests.
- Advise you of the potential consequences of your behaviour and any content you may post online.

3.0 Objectives of this Policy

- Provide guidance to staff on their personal responsibility as an employee of the Trust when using any social networking site.

- Help staff get the best out of the tools available while maintaining a safe professional environment and protecting themselves and the organisation's reputation.

- Ensure staff are aware of all relevant legislation and standards relating to online information, including codes of practice from related professional bodies and regulatory bodies.

- Provide managers and individual employees with information to consider before participating in or developing any new social media application.

- Enable the Corporate Communications Department to actively manage Southern HSC Trust corporate social media channels in a safe environment

and to monitor social media channels.

4.0 Codes of Practice

Professional bodies may have issued their own code of practice relating to the use of social media. Staff have a personal responsibility to be aware of codes of practice relating to their professional body, if they are a registrant. However, this Trust policy remains the definitive guidance for all staff in the use of social media as an employee of the Southern HSC Trust.

5.0 Policy Statement

The Trust has a clear expectation that if a member of staff identifies an association with the Trust, discusses their work or colleagues, or comes into contact, or is likely to, with service users on any social media sites, they will behave appropriately, in a way which is consistent with the Trust's values and where relevant, with your professional code of conduct. The duty to act in a manner that is in line with this policy does not only apply when an employee is at work, but at all times when a connection to the Trust has been made.

6.0 Scope of Policy

This policy applies to all staff directly employed by the Trust and for whom the Trust has legal responsibility. The policy also applies to students on placement, and those people working for the Trust and carrying out Trust duties while employed by a recruitment agency or similar third party.

Examples of social media include social network sites (for example Facebook, Twitter, LinkedIn, Instagram, Snapchat, Reddit, Pinterest, YouTube, TikTok), blogs and messenger tools (for example WhatsApp, Facebook Messenger).

Staff are ultimately responsible for their own online behaviour. Staff must take care to avoid online content or actions that are inaccurate, libellous, defamatory, harassing, threatening or may otherwise be illegal. It is possible for staff to be subject to civil proceedings or criminal prosecution, in addition to any disciplinary action that may be taken and/or potential referral to the relevant professional regulatory body under fitness to practice.

Staff must ensure that they are complying with the requirements of this policy and must make sure that they conduct themselves online in the same manner that would be expected of them in any other situation, to uphold the reputation of the Trust and, where relevant, the reputation of their profession.

7.0 Responsibilities

All Southern Trust staff, students and workers are responsible for the success of this policy and should ensure they take time to read and understand it. Any misuse of social media should be reported to your line manager.

It is the responsibility of the line manager to investigate any reported breaches of this policy, in conjunction with HR and Corporate Communications. Where necessary, it is also the responsibility of line managers, through the Trust's Information Governance Department to report breaches of Data Protection to the Information Commissioner's Office (ICO).

Chief Executive & Head of Communications

The Chief Executive has responsibility for ensuring that there is an appropriate structure for the monitoring and review of the use of Social Media within the Southern Health Trust.

The Chief Executive has delegated to the Head of Communications responsibility for establishing and monitoring the implementation of the Social Media Policy.

The Head of Communications is responsible for the management of the Social Media Policy within the Trust and will provide leadership, direction and oversight of the Trust's Social Media Strategy.

Managers

The Chief Executive requires all managers within the Trust to establish and monitor the implementation of this Policy within their area of responsibility.

It is the responsibility of all line managers to investigate any reported breaches of this policy in conjunction with Human Resources, Information Governance, Communications and ICT Services.

Employees

All staff are required to familiarise themselves with this policy and comply with its provisions. Any misuse of social media should be reported to your line manager.

8.0 Key Policy Principles

Any staff member or person working for the Trust is free to participate on social media. Trust staff are the organisation's best ambassadors and many already use

social media in a personal and professional capacity. This policy aims to support the responsible use of social media, not restrict it.

Staff and others working for the Trust should use discretion and common sense when communicating online. Many people now use one account (for example a personal Twitter account) to post a combination of personal and professional content. This means they often identify themselves as a Trust employee or representative on their account, which leaves them open to scrutiny and criticism.

However, Trust staff or people working for the Trust who do not identify themselves as an employee or representative, or who use separate personal and professional social media accounts, are still expected to uphold the standards within this policy.

Personal Use of Social Media

As an employee, you need, however, to be aware that once you post any personal comments / information / photos / videos on social media sites, your right to privacy may be compromised. Employees are therefore strongly advised to check the privacy settings on their social media sites. It is also strongly recommended that employees do not add employment details to any social media profile page.

As Trust employees it is important to be aware that if you post information or views about the Trust, or connected to your employment with the Trust, during personal time, they cannot be isolated from your working life. You should assume that all comments you make are in the public domain and could potentially remain so permanently. Also, if you have posted anonymously, at some point your identity and nature of employment could be revealed.

When you have identified your association with the Trust when using any social media site it is expected that you behave in a manner that acknowledges the duty of care that you owe to your colleagues and the organisation.

Staff should never do any of the following:

i.   never include any work related information on any personal social media sites.
ii. never share confidential information online or post comments about other employees or Service Users.
iii. never take photographs, video or audio clips on Southern Trust premises and post online.
iv. never accept friend requests from patients, clients or their family members who you only know through your professional work (you should immediately remove any that apply from your 'friends' list).
v.   never use social media sites to bully or intimidate another member of staff (including posting inappropriate or offensive comments and pictures).

vi.   never use social media sites in any way which is unlawful or grossly offensive.

vii.   never impart any information that could be considered sensitive, such as third party supplied details.

viii.   imply they are speaking for the Trust when posting in a personal capacity.

ix.   publish your Trust email address on a personal social media account.

x.   use your Trust email address as part of your registration/login details for a personal social media account.

xi.   let social media use interfere with your job, whether you are accessing platforms through the Trust network or on a personal device.

As an employee of the Trust and you make any inappropriate comments/use offensive information in social media activities these may ultimately be brought to the attention of your line manager and call into question suitability to be working with vulnerable adults or children and may in turn require the Trust to assess and respond to any potential risks that come to light. You also need to be aware that, when in the public domain, any information they provide about your social activities whilst off sick may call into question the genuineness of your sickness and that this information may be used as evidence in any disciplinary proceedings.

In any instances where there are any comments, questions or observations which you wish to raise in connection with your employment with the Trust, either positive or negative, these should be raised through the appropriate channels internally rather than these views being expressed on social networking sites. Additional guidance and support is available through existing Trust Policies and Procedures, Line Managers or the Human Resources Department.

You should remember that personal is not the same as private. Once something is published on social media it is no longer private.

Professional Use of Social Media

If you identify yourself as a Southern Trust employee on a social media website you must ensure your profile and related content is consistent with how you would present yourself with a Service User whilst in a work setting.

If you are writing in a professional capacity, you should usually identify yourself. Any material written by authors who represent themselves as doctors or a medical professional are likely to be taken on trust and/or to represent the views of the profession more widely.

If you publish information on the internet relating to work or services associated with the Southern Trust, use a disclaimer such as "The views expressed are my own and do not necessarily represent the views of the Southern Trust".

You should maintain boundaries between your personal and professional lives by customising your privacy settings for social media websites and avoiding personal information becoming visible. You are publicly representing the Trust and should participate in the same way you would in a public meeting or forum. Remember your comments online will be permanently available to others and open to scrutiny.

You should also be aware that you may attract media interest in yourself or the organisation, so proceed with care. If you have any doubts, take advice from your line manager, who may in turn contact the Trust media office in Corporate Communications. If you see something on social media that needs a corporate media response, please share it with our Trust media office Email: corporate.hq:@southerntrust.hscni.net

Professional use of social media is defined as:

i. posting about, sharing, discussing or reacting to work-related issues on third party social networks, professional forums or discussion boards.

ii. creating and/or managing content on a social media site created, branded and managed by the Trust.

iii. social media monitoring for business purposes.

When participating in a professional capacity on behalf of the Trust, you **must not:**

i. Mention **any** information relating specifically to an individual service user.

ii. Use offensive, sexist, racist, hateful or otherwise offensive or discriminatory language.

iii. Publish information that is disparaging to the HSC, service users or other members of staff.

iv. Endorse or appear to endorse any commercial product or service.

v. Voice opinion on specific political representatives or parties.

vi. Use the Southern Trust logo as your account image.

Creating social media accounts

The Southern Trust Communications Department will create and operate corporate social media channels to engage with key stakeholders. Individual Trust teams or staff are not permitted to create their own social media channels or respond to queries arising on same, on behalf of the Trust without advice from the Communications Department.

It is important for the Trust to maintain a coherent online presence through the strategic use of official communication channels. Therefore, without having developed a business case and gained approval from the Corporate Communications Team you must not set up:

- Southern Trust Twitter accounts
- Southern Trust Facebook pages
- Southern Trust Instagram accounts
- Southern Trust YouTube / Vimeo channels
- A presence on any other social media site that seeks to represent the official views of Southern Trust
- Unauthorised blogs on behalf of Southern Trust services or individuals
- Surveys using any unapproved online channels

If staff decides to set up their own account it will be the account holder's responsibility if any issues arise.

Video and media file sharing

Video is great for providing stimulating and engaging content, which can be shared on social media sites and embedded on other people's websites. To reach the widest audience, it is important that, where possible, public video content is placed on the Southern Trust YouTube channel.

You **must not** post video content on a non-approved online channel. Some social media videos may not be suitable for You Tube.

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.

Official Southern Trust content should be branded and tagged appropriately, and should not be credited to an individual or production company.
Videos should also meet accessibility guidelines and be useable by all, regardless of disability. Captions should always be added where possible.

Safeguarding children, young people and adults at risk

Social media/networking sites introduce a range of potential safeguarding risks to these groups. Most children, young people and adults use the internet positively, but sometimes they and others may behave in ways that pose a risk such as but not limited to:

- online bullying
- grooming, exploitation or stalking
- giving away personal details
- exposure to inappropriate material or hateful language
- encouragement to engage in illegal acts, violent behaviour, self-harm or risk-

taking
- people's wellbeing being damage

Follow these steps to safeguard children, young people and adults at risk:
- do not target or engage with children who are likely to be under the minimum requirement age for the social media platform you are using or promoting (this is usually 13 years old, but can vary by platform).
- do not accept 'friend' requests from anyone you suspect to be underage.
- avoid collecting personal details and do not ask users to provide any, including:
  - home and email addresses
  - school information
  - home or mobile numbers

- you should not use any information in an attempt to locate and/or meet a child, young person or vulnerable adult unless it is work-related.
- be careful how you use images of children, young people or adults – consider using models, stock photography or illustrations.
- if a child, young person or adult at risk is named, do not use their image.
- if an image of a child, young person or adult at risk is used, do not name them.
- where necessary, get parents'/carers'/guardians' or Lasting Power of Attorney's written consent to film or use photographs on websites.

Safeguarding yourself

If you are using corporate or personal social media/networking accounts for work-related activity, you should also:

- ensure your privacy settings are set up so that personal information you may not want to share is not available to the public.
- have a neutral picture of yourself as your profile image.
- avoid using your work contact details (email or telephone) as part of your personal profile or personal contact details as part of a work profile.
- avoid engaging in intimate or sexual conversations.
- ensure any personal pictures you upload are not intimate, compromising or sexually explicit.
- inform the Corporate Communications Team and your line manager if any social media or online interaction threatens to get antagonistic or upsetting (you should also disengage from such an interaction).

Moderation/unacceptable content

All feedback to the Southern Trust received through social media channels will be sent to the relevant service area and should be considered by managers prior to developing an appropriate response with support from the Communications Department.

Responses to public posts will be managed by the Communications Department. Responses must be conversational, objective, and polite in tone with information sharing the main goal and will require Assistant Director/Director approval.

Certain types of content will be removed from our social media channel on the following grounds. The Southern Trust reserves the right to remove comments, without notification, including those which:

- bully, harass or intimidate any individual or organisation
- are unlawful, libellous, defamatory, abusive, threatening, harmful, obscene, profane, sexually oriented or racially offensive
- infringe or violate someone else's rights
- discuss ongoing legal proceedings
- are spam
- advertise products or services

The Southern Trust will only have control over comments on our own corporate channels.

Breaches of the Policy

Breach of this policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether Trust equipment or facilities are used for the purpose of committing the breach.

Any member of staff suspected of breaching this policy will be required to co-operate with any Trust investigation. This may include removing internet postings which are deemed to constitute a breach in this policy. Failure to comply with such a request may in itself result in disciplinary action.

If an employee is concerned about another employee's behaviour online then they should report this to their line manager along with any supporting evidence of their claim, so that the appropriate action can be taken in accordance with Trust policy.

9.0 Relevant Policies, Procedures and Guidance

When using Social Media all staff should bear in mind the Policies and Codes of Conduct that are part of your employment and professional requirements. These include:

- Information Technology Security Policy 1.3 March 2021
- Data Protection and GDPR Policy

- [Guidance on the recording of staff by service users](#)
- [Conflict Bullying Harassment Policy.pdf](#)
- [Southern Health & Social Care Trust Whistleblowing Policy](#)
- [Equality, Diversity and Inclusion Policy (Regional Policy)](#)
- Your Contract of Employment
- [Code of Conduct for HSC Employees (Southern HSC Trust).pdf](#)
- Professional Codes of Conduct and any relevant guidance on using Social Media which is relevant to your profession.

10.0 Equality Statement

This policy has been screened for equality implications as required by Section 75 and Schedule 9 of the Northern Ireland Act 1998. Equality Commission guidance states that the purpose of screening is to identify those policies which are likely to have a significant impact on equality of opportunity so that greatest resources can be devoted to these.

Using the Equality Commission's screening criteria, no significant equality implications have been identified. The policy will therefore not be subject to an equality impact assessment.

Similarly, this policy has been considered under the terms of the Human Rights Act 1998, and was deemed compatible with the European Convention Rights contained in the Act.

11.0 Alternative Formats

This document can be made available on request in alternative formats, e.g. plain English, Braille, disc, audiocassette and in other languages to meet the needs of those who are not fluent in English.

12.0 Records Management

The supply of information under the Freedom of Information does not give the recipient or organisation that receives it the automatic right to re-use it in any way that would infringe copyright. This includes, for example, making multiple copies, publishing and issuing copies to the public. Permission to re-use the information must be obtained in advance from the Trust.

13.0 Sources of Advice and Further Information

Line Managers should be contacted in the first instance, in relation to any specific queries on Policy content. Line Managers should then escalate queries which they are unable to address, to the Policy Authors.