COMMUNICATIONS PROCEDURE

Heart of England NHS
NHS Foundation Trust

Social Media Procedure v1.0

CATEGORY:	Procedure
CLASSIFICATION:	Governance, Communications
PURPOSE	To set out the procedure for setting up, using, monitoring and managing social media accounts by Trust staff. This document should be read in conjunction with the Social Media and Online Participation Policy.
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1. Definitions

This document should be read in conjunction with the Social Media and Online Participation Policy.

For the purposes of this procedure, “social media” shall be defined as any online communication channel which facilitates networking via the World Wide Web, which is not developed by the Trust, including but not limited to:

- social networking and “micro-blogging” websites and services, such as Twitter, Facebook, Google+ and LinkedIn
- video and image sharing sites, such as Pinterest, Instagram, YouTube, Vimeo and Vine
- personal websites
- personal blogs

A “social media account” shall be defined as any page, group or other specific channel of communication set up using social media.

The role of the “The Communications Officer” shall be defined as that of the specific post-holder and any delegated members of the Web and wider Communications teams.

2. Background

Social media offers organisations new and increased opportunities to engage directly with key stakeholders. This gives the Trust the ability not only to communicate proactively with a wider audience, but also to respond in real-time to queries and complaints.
The use of social media helps the Trust to appear more innovative, approachable and transparent in its approach. It also allows us to assist like-minded people and facilitate communication between those with common interests, for example patients who share a condition, or professionals in a particular field.
The Trust's online communications are important in supporting the core functions of the Trust, and therefore in helping to express its vision and values. In a Trust which prides itself on the value of innovation, the use of social media is vital to allow us to communicate effectively with as wide a range of people as possible and to advance the Trust's reputation.
Social media also helps the Trust to uphold its other values of responsibility, respect and honesty.

3. Purpose

This procedural document gives clear and comprehensive guidance on the usage of social media by Trust staff, in both a personal and a professional capacity.

4. Scope

This procedure and its associated policy apply to the use of social media in a professional capacity and in a personal capacity by all staff members, whether they’re already using social media or thinking of setting up accounts with Twitter, Facebook or any other social media platform.

The Trust recognises that social media is an increasingly useful communication tool and acknowledges the right of staff to freedom of expression when using their own personal social media accounts. However, staff must be aware of the potential implications of posting material which is illegal or which could be considered abusive, defamatory, offensive or inappropriate, even if the intention was humorous.

The Internet and associated technologies are rapidly evolving and developing. It is therefore impossible to cover all eventualities in this document. However, the principles it sets out should always be followed.

5. Anticipated usage of social media by the Trust

5.1. Patients and visitors

Social media presents an ideal opportunity to communicate quickly and directly with patients and visitors. As well as publicising relevant publications, e.g. patient information leaflets, and promoting services, social media can be used to notify people of issues directly affecting their visit to hospital, e.g. waiting times or transport delays.

It also offers an immediate and accessible route for patients and visitors to submit queries or feedback to the Trust.

5.2. News and media

Social media can be used to promote any news stories generated by the Trust, which carries a reputational benefit. It also increases visibility in sectors of the media such as TV and newspaper journalism.

5.3. Recruitment

Social media enables the Trust to communicate directly with prospective employees, potentially saving money on advertising, or offering additional channels via which to gain maximum coverage for advertising vacancies.

5.4. Campaigns

Campaigns around health issues and awareness, recruitment, services, or any other subject are easy and usually free to publicise via social media.

The viral effect – where a post is shared by other users, meaning a wider audience can see and in turn share it with their networks – means that return on investment (ROI) can easily be increased.

5.5. Members and governors

Social media provides an easy and free means by which to promote events and other key issues for members and governors of the Trust, e.g. elections to the Council of Governors (CoG), health seminars and CoG meetings.

As members and governors are already actively engaged with the Trust and its work, this audience group offers potential for finding advocates (see “Advocates”, below) and assisting with viral marketing (see “Campaigns”, above).

5.6. Healthcare professionals

Social media offers a direct, free and easy way for healthcare professionals to share best practice and learning, improving the overall healthcare landscape.

Networks can also be created and grown using social media, increasing scope for partnership and consistency.

5.7. Education

The Trust can use social media to advertise courses, and communicate efficiently with key audiences, including medical students, student nurses and junior doctors.

5.8. Senior management

Social media presents the opportunity for senior managers to increase their visibility among Trust staff, patients and visitors, partner organisations, local industry leaders and/or other stakeholders.

5.9. Advocates

Social media offers an easy method for the Trust to find and utilise advocates – other users who are willing to help us spread key messages about our work, especially via the viral effect.

6. Process

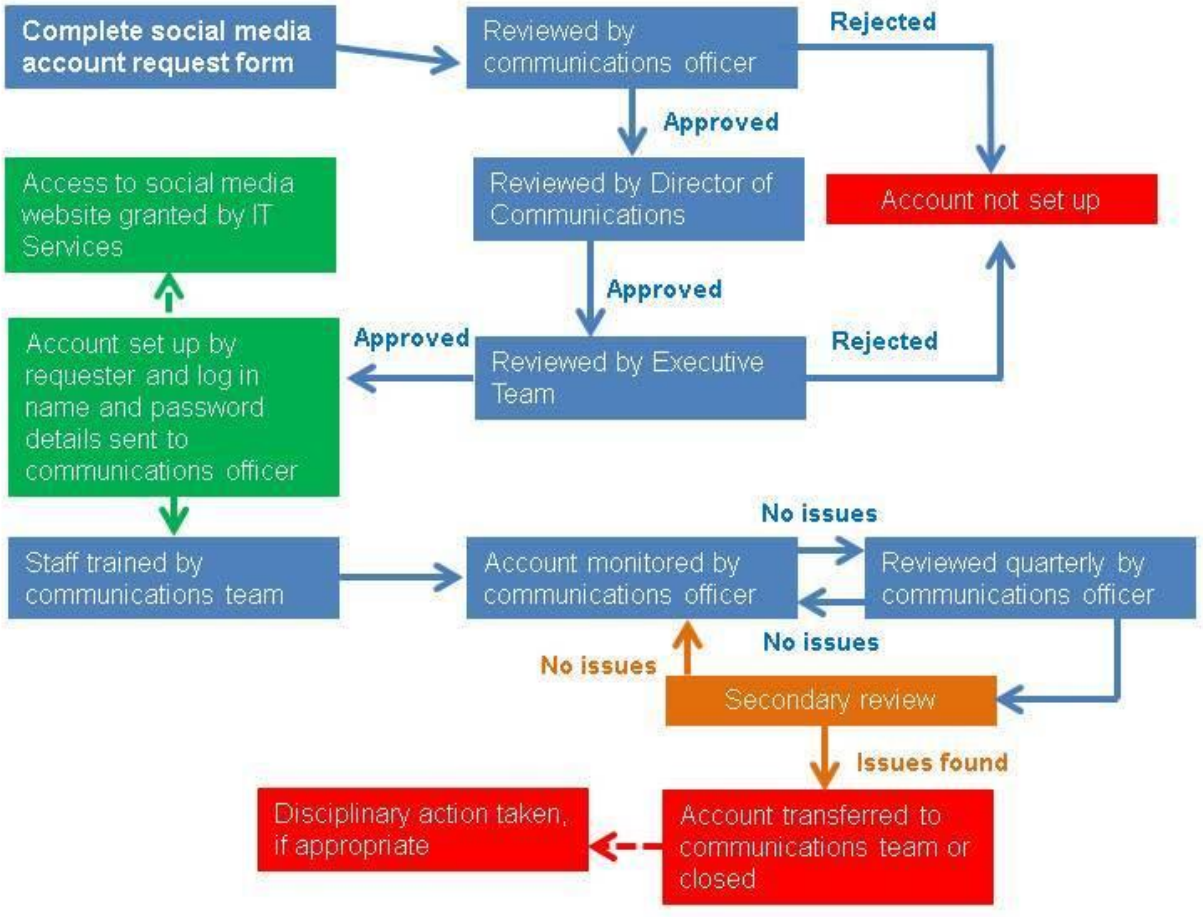
6.1. Personal accounts

Staff members should note the guidance set out in appendix 4 and the Social Media Policy.

It is important to note that bringing the Trust into disrepute via social media could lead to disciplinary action and potential dismissal.
The Trust does not support the personal use of social media during working hours, either via Trust-owned equipment or personal devices. Personal use of social media should only take place outside of the work place or during agreed break periods. See page 8 of the Social Media Policy.

6.2. Trust accounts

The process for setting up Trust accounts – on behalf of an individual, team or service – is outlined in the flowchart below. Please use this request form for a Trust Social Media account.



For a detailed process and rejection/approval/review criteria, please see appendix 1.

6.21 Login details

The communications officer and approved staff members (responsible manager* and maximum three other members of staff) will note the login details for the social media account, which must not be shared with anyone outside this group of staff.

*Responsible manager must be Band 8C or above.

In the case of Facebook, where administrators use their own login details to access the Trust account, access to administer the Trust account will be granted to the communications manager, responsible manager and maximum three other members of staff.
Any login details used to access a Trust social media account must be changed if an administrator or editor leaves the Trust. The login details must be shared with the Digital Communications Manager.
In the case of Facebook, access to the Trust account will be removed for the departing member of staff and will be granted to a suitable replacement.

7 Content

7.1 Best practice

This section relates to the use of Trust social media accounts, i.e. those set up for use by and/or on behalf of the Trust and its services. For guidance on using personal accounts, please see appendix 4.

- Once information is available on the World Wide Web, it is very difficult – arguably impossible – to completely remove it. Therefore, staff should thoroughly check any information before posting
- Social media is, generally speaking, a public forum. The principles covering the use of social media by Trust staff in both a professional and personal capacity are largely the same as those that apply for any other means of communication
- Social media must be used responsibly and, when used in a professional capacity, must only be used to enhance the core work of the individual, team, service or Trust. Irrelevant or inappropriate content should not be posted from any Trust-related account
- The Trust shouldn't try to directly answer every question submitted via social media. In some cases it won't be appropriate for reasons of propriety, impartiality or legality. Instead, in these instances, enquiries should be acknowledged and passed to the relevant team to be answered via the appropriate channels and/or the enquirer should be directed to the correct means of contact
- Staff should not engage in conversations with "trolls" – users whose only goal is to abuse, offend and/or insult

7.2 Top tips

Be safe	Never give your personal information to others via social media unless you're sure you're using a secure, private method. If in doubt, don't send it
Add value	Always try to use social media to communicate a positive message, reach a positive outcome or engage in worthwhile dialogue. If you use social media for the sake of it, people will notice and won't engage with you
Be responsible	Be aware that not only you, but also your manager and the Trust, are

	responsible for anything you post
Use your time wisely	Don't forget your day job. Use of social media can be a valuable addition to your set of communication tools, but it shouldn't interfere with your core duties
Make yourself known	People respond better to people than to what they might perceive as faceless organisations. If possible, identify yourself when posting or responding to others – without giving away anything personal
Be professional	Keep your personal and professional accounts and activities separate (see appendix 4 for guidance on using personal accounts) and always make sure you're posting from the correct account
Be respectful	Don't dismiss other users (unless they're trolls – users who only post to offend, harass or insult), or insult them. Try to put yourself in the other user's place. How would you want to be treated?
Acknowledge your sources	If you're referencing somebody else's work, try to include a link to it if appropriate and, if necessary, seek permission. (If you're referencing work derived from research funding, you should ensure the funder is acknowledged appropriately in accordance with the funding agreement.)

Staff should be aware that the posting of any content considered inappropriate may result in disciplinary action. Please see the below section, "Rules of conduct" for further information.
If in doubt whether content is appropriate, please contact the communications team who are happy to help or, if necessary, refer you to the relevant expert.

Telephone: 43337
Email: communications@heartofengland.nhs.uk

7.3 Multimedia content, including photographs, videos and audio files

Photographs, videos, podcasts and other multimedia content are an everyday part of the social media environment. Mobile phones, tablet computers and digital cameras make the recording and uploading of multimedia content extremely easy.
The requirement to ensure that multimedia content is appropriate is the same as for textual content.

Each person identifiable within the multimedia content must give their consent for the content to be uploaded for use in social media.

Do not tag people in multimedia content, as this may blur the boundaries between professional and personal use and could identify an individual to a wider audience.

Staff must respect copyright laws when posting multimedia content. Unless specifically stated otherwise, online content usually remains the intellectual property of the owner. In most cases, it is **not** acceptable to take a photograph, video, sound file or other media from the Web and post it to social media as if it is yours. In many cases, even attribution to the owner of the content does not permit usage of such media by others. Staff members must remember that both they and the Trust may be held responsible for breach of copyright.

Please see the "Rules of conduct" section below for further information on what type of content must not be posted.

If in doubt whether content is appropriate, please contact the communications team, who are happy to help or, if necessary, refer you to the relevant expert.

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7.4 Other languages

If requested, Heart of England NHS Foundation Trust is legally obliged to provide any publicly available information in another language. If any social media content is requested in another language, the editor/administrator should contact the Interpreting Services team, providing their departmental cost code.

Telephone: 41331

Interpreting Services will liaise with the Trusts preferred provider to supply a translation.
Staff should always let the enquirer know that their request has been passed on and that a translation will be provided in due course.
While online translation services such as Google Translate and BabelFish can be helpful in interpreting queries submitting in other languages, they should not be seen as a definitive solution. If in doubt, Trust social media administrators/editors should contact Interpreting Services.

8 Contact and queries

8.1 Compliments

Compliments should be forwarded to our Patient Services team bhs-tr.Complaints-ConcernsandCompliments@nhs.net to be logged. Social media editors should also acknowledge the compliment and thank the user for their message.

8.2 Negative feedback

If you receive negative feedback via social media, it's important to not only acknowledge it by replying, but to also ensure the matter is resolved.
If you can do anything within your team to find a resolution, this should be done, but you should also refer the matter to the Patient Services team, and encourage the complainant themselves to contact Patient Services. Feedback should be forwarded to bhs-tr.Complaints-ConcernsandCompliments@nhs.net. Always let the complainant know when you have passed on the details of their complaint.
“Complaints”, as defined by the Trust’s Complaints Policy and related procedural documents must be handled in accordance with the policy.

8.3 Trolls

It is important to differentiate between genuine negative feedback and that posted by trolls – users who post solely to abuse or offend other users of the World Wide Web. Generally, trolls should be ignored. If in doubt as to whether feedback is genuine or an example of trolling, please contact the communications team.

Telephone: 43337
Email: communications@heartofengland.nhs.uk

8.4 Contact by press/media/journalists

If a journalist or other employee of the press or media contacts the Trust via social media, or about the use of social media, staff must notify the communications team immediately and should not attempt to respond to the query themselves, other than to acknowledge receipt.

Telephone: 43337
Email: communications@heartofengland.nhs.uk

9 Rules of conduct

This section relates to the use of Trust social media accounts, i.e. those set up for use by and/or on behalf of the Trust and its services. For guidance on using personal accounts, please see appendix 4.

The following rules inform staff of things they must or must not do when using social media in a professional capacity.

Staff must:

- ensure their use of social media meets the requirements not only of the Trust's policy and procedure, but also of those issued by any relevant professional body, including but not limited to the Nursing and Midwifery Council and the General Medical Council
- consider their privacy settings and safeguard their accounts
- remember that the Trust is responsible for the actions of its employees. In certain cases, both the Trust and its employees could be at risk of disciplinary measures, including legal action
- obtain written consent from each identifiable person within any multimedia content for the content to be uploaded for use in social media
- report any content posted to a Trust account, which could be considered fraudulent, harassing, embarrassing, sexually explicit, profane, racist, homophobic, sexist, obscene, intimidating, defamatory, or otherwise unlawful, inappropriate or offensive, to:
    - the communications team
    - the Human Resources department (if posted by a staff member)
- acknowledge and reply to feedback, stating steps to be taken to resolve any issues, if necessary (see "compliments and negative feedback" above)
- only post content which is relevant to the Trust and/or the intended audience
- be honest when posting or replying to other users

Staff must not:

- breach the confidentiality of staff, patients or the Trust, for example by disclosing patient identifiable information, or otherwise contravene the Data Protection Act
    - Staff must not, for example, post photos of patients without their written consent
- publish any confidential information about or acquired from the Trust, its services or staff. Staff must consult their line manager if they are unclear about what information might be confidential
- Befriend patients or service users on social media e.g. Facebook
- advertise or sell information about or acquired from the Trust for publication by others
- show bias to any specific commercial organisation
- discuss Trust procurement contracts, processes or tenders
- adversely affect an individual's dignity
- personally attack, embarrass or criticise anyone – including but not limited to patients, visitors, volunteers, Trust members, other staff members and Trust managers – whether any individuals are identified or not
- use social media to attack the Trust or the NHS as a whole
- bully or harass colleagues, patients or any other individuals
- use social media as a "whisteblowing" mechanism. In line with Trust Policy and legal requirements, the first step for staff should be to raise any concerns or issues internally. Please refer to the Trust's policy and procedure on 'Raising Concerns' for full details
- post any content which is likely to bring the Trust into disrepute
- post any content which could be considered fraudulent, harassing, embarrassing, sexually explicit, profane, racist, homophobic, sexist, obscene, intimidating, defamatory or otherwise unlawful, inappropriate or offensive
- post any content which they do not have permission to post, e.g. text, images, video or audio content which is subject to copyright

- breach any Trust policy or break the law
- promote, depict or encourage any illegal activity
- respond to any press or media enquiries, or freedom of information requests, other than to acknowledge receipt, via social media. These should be forwarded to the communications team
- post unsuitable links (see appendix 5)
- impersonate or appear to impersonate any other user
- encourage activities which could endanger anyone's safety or wellbeing
- support or promote any political party or religious view
- post any content which is indicative of, or which could cause, a conflict of interest between the Trust, its employees and any third party

If in doubt whether content is appropriate, please contact the communications team, who will be happy to help or, if necessary, refer you to the relevant expert.

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10 Privacy settings

Some social media websites allow users to alter privacy settings, for example to control who can see posts, or who can comment on them.
If appropriate, social media accounts should have appropriate privacy settings applied to reflect the intended use and audience. If there is a requirement for any privacy settings to be applied to the account, this should be discussed with the communications team when creating the account.
Privacy settings are specific to social media websites and are not controlled by the Trust. They can be very useful, but the Trust can't guarantee, and is not responsible for, their reliability.
The IT Services Team is not able to offer assistance with social media privacy settings.

11 Hacked and fake accounts

Hacking a social media account means accessing it without authorisation for the purposes of posting using that account, usually by obtaining the login details.
Fake accounts are accounts which appear, or claim, to have been set up on behalf of the Trust, but which are not authorised by the Trust.
If you spot a fake account or suspect that a Trust account has been hacked, this must be reported immediately to the communications team.

12 Conflict of interest

If staff think anything posted on social media could cause a conflict of interest, or if they think their role at the Trust could be compromised by the social media activity of other users, they should discuss this with their line manager in the first instance. The communications team can also be contacted for advice.

Telephone: 43337
Email: communications@heartofengland.nhs.uk

13 Associated documents

- Social Media Procedure
- Handling the Media Policy
- Freedom of Information Policy and Procedure
- Information Governance Policy
- Information Risk Management Policy
- Data Protection Policy
- Disciplinary Policy

- Dignity at Work Policy (Bullying and Harassment Policy Procedure)
- Photographic, Video and Mobile Device Consent and Confidentiality Policy
- Celebrity and VIP Visitor Policy
- Raising Concerns (Incorporating Whistleblowing) Policy and Procedure
- Confidentiality Policy and Procedure
- Complaints and Concerns Policy and Procedure

14 References

Nottingham University Hospitals NHS Trust. Corporate Use of Online Social Networks Policy. (Cited 20 June 2014.)

Norfolk and Norwich University Hospitals NHS Foundation Trust. Policy on the Personal Use by Staff of Social Media. (Cited 28 July 2014.)

Appendix 1 – Detailed process for application for creation of Trust social media accounts

Step 1	After identifying that a social media account is required by their team, department or service, a responsible manager (Band 8C or above) should complete the social media account request form at (need form)
	The manager must include the following in the request: • Their name and contact details • Their position • Names, contact details and positions of a maximum of three members of staff from their team who, in addition to themselves, will have access to and be responsible for the usage and management of the social media account • Details of the reason for the request • The intended benefit of the social media account to patients, Trust colleagues, wider healthcare community or other stakeholders • Details of how the team intends to monitor and use social media, including: ◦ which websites they will use ◦ frequency of posting ◦ frequency of monitoring ◦ turnaround times for responding to queries, complaints and other feedback received via social media
Step 2	Upon receipt of the request, the communications officer will review the above details against the approval, rejection and review criteria (see appendix 3)
Step 3	If approved, the request will be forwarded to the Director of Communications, who will also review the details
Step 4	If approved, the request will be raised at the next meeting of the Trust's Executive Team, who will have the final say on whether the creation of the account is to be approved or rejected
	The Executive Team may apply any additional caveats to the creation and usage of the social media account
Step 5	The communications officer will work with the staff members identified in the request to set up the social media account(s)
	The communications officer and approved staff members (responsible manager and maximum three other members of staff) will note the login details for the social media account, which must not be shared with anyone outside this group of staff
	The communications officer will add the details of the account to the register of current social media accounts used by and on behalf of the Trust
	The communications officer will agree an approximate frequency of posting upon creation of the account, and will also agree on a turnaround time for responses to any communication received via the social media account
Step 5A	The IT Services department will grant access to the relevant social media website(s) to the responsible manager and no more than three members of staff who will be responsible for monitoring and updating the account
Step 6	The communications team will deliver any necessary training to the approved staff members
Step 7	The communications officer will – no less frequently than once a week – monitor all current Trust social media accounts
Step 8	The communications officer will conduct a quarterly review of each Trust social media account, in accordance with the review criteria set out in appendix 3
Step 9	If during the review process it is decided that the social media account is not being used correctly, a secondary review will be conducted at a time agreed between the communications officer and the manager responsible for the social

	media account
Step 10	If, after the secondary review is conducted, there is found to be little or no improvement, control of the social media account will be passed to the communications manager, who – on advice from the Director of Communications and Executive Team if necessary – may in turn transfer responsibility to another manager or close the account
Step 10A	If necessary, e.g. in the case of misconduct, disciplinary action will be taken against the member of staff responsible for the transgression and/or the responsible manager

It remains the right of the Director of Communications and the Executive Team to alter the terms of usage or instigate the closure of any Trust social media account at any time.

Appendix 2 - Monitoring Matrix

MONITORING OF IMPLEMENTATION	MONITORING LEAD	REPORTED TO PERSON/GROUP	MONITORING PROCESS	MONITORING FREQUENCY
Submissions of requests for creation of new social media accounts	Communications officer	Director of Communications	Monitoring emails	As required
Content being posted on Trust social media accounts is suitable and appropriate, i.e. not in breach of the detailed rules of conduct and guidance set out by the Social Media Procedure	Communications Officer	Director of Communications	Frequently monitored on an informal basis using social media websites themselves Formally reviewed using social media websites and any appropriate monitoring tools	Not less frequently than once a week

Appendix 3 – Criteria for the approval, rejection, review and closure of Trust social media accounts

Rejection of requests to create new Trust social media accounts

Requests to create a new social media account may be rejected at any of steps 2 – 4 listed in appendix 1 above for any of the following reasons:

- No discernible benefit to the team, department, service or the Trust
- Lack of sufficient resources to use and manage the social media account
- Potential conflict of interests
- Inappropriate intended usage of the account
- Insufficient authority of the proposed responsible manager

The final decision on whether to approve or reject a request to create a Trust social media account will be made by the Executive Team, who may offer any other reason for rejecting a request.

Approval of requests to create new Trust social media accounts

Conversely, no request shall reasonably be rejected where:

- the objectives of the account's usage are clear and considered to be of benefit to the Trust
- there is sufficient illustration of the benefit to the Trust and any relevant stakeholders of the proposed social media account
- it can be demonstrated that there is adequate resource to manage the account, and that usage will be upheld in the event of the absence of any of the approved staff members
- the requesting manager is considered to be sufficiently responsible to be held accountable for the account

Review of social media accounts

If during the frequent monitoring or quarterly review of any Trust social media account any of the following are found, a secondary review may be called by the communications officer, Director of Communications or Executive Team:

- Posting less frequently than the standard agreed upon creation of the account
- Taking longer than agreed, and/or is considered acceptable, to respond to queries, complaints or other communications received via social media
- Account being used in a different way to that agreed when the creation of the account was approved

Any breach of the rules featured in the section of this document titled "Rules of conduct" may lead to immediate closure of the account.

Appendix 4 – Guidance on the use of personal social media accounts by Trust staff

All Trust staff who use, or intend to use, social media in a personal capacity must read the following information.

While staff are free to set up and use their own social media accounts, it is important to recognise that inappropriate personal usage can have a negative impact on the Trust.

While much of the following sets out guidance and offers advice on how to use personal social media accounts, in certain cases breaching these guidelines may result in disciplinary action and could lead to dismissal.

This guidance is not intended to prevent staff from portraying Heart of England NHS Foundation Trust (HEFT) in a positive manner if they choose to do so.

- It is advisable that staff do not identify themselves as employees of HEFT when using their own personal social media accounts, but if they wish to do so the Trust will not (reasonably) object, assuming the below guidance is followed
- If staff do identify themselves as employees of the Trust via social media, or if their role at the Trust is such that they have a high level of public visibility and are therefore easily recognisable as employees, they will be expected to behave in accordance with the Trust's vision and values
- Content posted on social media may be used as evidence if staff are found to be guilty of misconduct
- Staff should note that once they have identified themselves as employees or representatives of the Trust, inclusion of "Views are my own and not those of my employer", or similar disclaimers, will not preclude the Trust from taking action should the staff member post content which brings the Trust into disrepute or is otherwise deemed harmful to the organisation
- Staff should be mindful of the repercussions of using social media to network with people they have met via their employment at the Trust, particularly patients. Specifically, staff should ensure that their professionalism is not compromised, that no patient identifiable information is published online and that any such activity does not create or involve a conflict of interest. Such online relationships between staff and patients are not encouraged by the Trust
- All staff should be aware that the Public Interest Disclosure Act 1998 gives legal protection to employees who wish to raise any concerns about the conduct of their employer. The Act makes it clear that the process of "whistleblowing" or "speaking up" normally involves raising the issue internally first. The following Trust document set out the process for whisteblowing, and must be followed in such circumstances:
    - Raising Concerns (Incorporating Whistleblowing) Policy and Procedure
- Staff are advised not to post information online which could expose them to a high risk of identity theft, e.g. date of birth, address, place of work etc
- If a staff member is asked to remove content if it is felt that such content is harmful to the reputation of the organisation or an individual, they should do so immediately

In particular, when using their personal social media accounts, staff must not:

- breach the confidentiality of staff, patients or the Trust
- publish any confidential information about or acquired from the Trust
- advertise or sell information about or acquired from the Trust for publication by others
- discuss Trust procurement contracts, processes or tenders
- create or contribute to a conflict of interest regarding their employment at the Trust
- do anything to bring the Trust into disrepute

If a staff member is contacted by the media about content relating to the Trust which they have posted on their personal social media account, they should report this to the communications team and their line manager.

Appendix 5 – Unsuitable links

A link is classed as unsuitable if it points to material which:

- is offensive, e.g.:
    - pornography and sexually explicit content
    - text and images likely to offend
    - hate sites (on grounds of race, religion, gender or sexual orientation)
    - gratuitous violence
- is unlawful, e.g.:
    - 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
- presents virtual or real risk to the user, e.g.:
    - sites which might compromise a user's computer, e.g. which initiate downloads without prior confirmation
    - 18+ sites, e.g. gambling, alcohol or tobacco-related, or any other website or service deemed contrary to the core values of the NHS