

**Corporate Use of Social Media**

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| --- | --- |
| Responsible Director: | Director of Communications |
| Approved By: | Corporate Management Team |
| First Approved: | August 2017 |
| Date (s) Reviewed: | August 2022 |
| Other Relevant Policies: | Information Governance Policy  Internet Acceptable Use Policy  Email Acceptable Use Policy  Information Technology Security Policy  Freedom of Information Policy  The Data Protection Act 1998  The Computer misuse Act 1990  The Copyright, Design and Patents Act 1988  The Access to Health records Act 1990  The RIP Act 2000  The RIP(S) Act 2000  Freedom of Information (Scotland) Act 2002  The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000  Human Rights Act (1998)  The Privacy and Electronic Communications (EC Directive) Regulations (2003) |

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1. Introduction

Social media has become an integral part of modern life. It keeps us in touch with friends and family, it informs us about our world, and it gives us a platform allowing us to be heard.

There are also many benefits to using social media within our professional lives.

Social media helps NHSGGC to communicate with the public, its patients and staff; to consult and engage; and to be more transparent and accountable. It gives us opportunities to promote our reputation as a quality healthcare provider. It supports the development of professional networks and relationships and enables colleagues to communicate with and learn from fellow professionals. It provides opportunities to support the public in maintaining healthy lifestyles and managing long term conditions.

Alongside all the benefits that this brings we need to be aware of the responsibilities that come with social media and the risks that arise from the misuse of it – both for us as individuals and for the organisation.

NHSGGC encourages the responsible use of social media for professional purposes. This corporate policy has been developed to provide clear advice and guidance to employees on the use of social media in a professional capacity.

The policy sets out a process for the authorised use of social media for professional purposes to allow the organisation to realise the benefits of social media whilst ensuring the risks are appropriately assessed and managed.

It should be read in conjunction with the policy on personal use of social media.

Other relevant policies and legislation:

* Information Governance Policy
* Internet Acceptable Use Policy
* Email Acceptable Use Policy
* Information Technology Security Policy
* Freedom of Information Policy
* The Data Protection Act 1998
* The Computer misuse Act 1990
* The Copyright, Design and Patents Act 1988
* The Access to Health records Act 1990
* The RIP Act 2000
* The RIP(S) Act 2000
* Freedom of Information (Scotland) Act 2002
* The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000
* Human Rights Act (1998)
* The Privacy and Electronic Communications (EC Directive) Regulations (2003)

2. Scope

This policy applies to all employees of NHSGGC, whether full-time or part-time, whether on permanent contracts, fixed-term or bank, students, volunteers and contractors working on behalf of NHSGGC.

It covers the professional use of social media within NHSGGC. It does not cover what you discuss, comment on or publish in your own time on your own personal profile. This is covered by the policy on personal use of social media.

Social media is the collective of online communications channels dedicated to community-based input, interaction, content-sharing and collaboration.

Websites and applications dedicated to [forums,](http://whatis.techtarget.com/definition/discussion-board-discussion-group-message-board-online-forum) [microblogging](http://searchmobilecomputing.techtarget.com/definition/microblogging), [social networking](http://whatis.techtarget.com/definition/social-networking), [social bookmarking](http://whatis.techtarget.com/definition/social-bookmarking), [social curation](http://whatis.techtarget.com/definition/social-curation), and [wiki](http://searchsoa.techtarget.com/definition/wiki)s are among the different types of social media.

This policy covers social media used both inside and outside of the organisation to exchange and share content with colleagues, patients and the public.

Within the scope of the policy are the social media sites that are used to link communities of staff both within NHSGGC and with other organisations which are open and public and external facing social media sites that are open to the public or closed accounts involving communication and engagement between staff and patients or staff and the public.

Specific examples of social media sites included within the scope of the policy are:

Facebook, Youtube, Instagram, Twitter, Pinterest and Flickr.

Microblogging and vlogging are also within the scope of this policy.

Closed’ applications for communicating and sharing knowledge including whatsapp, sharepoint, Messenger, snapchat, wetransfer and dropbox are outwith the scope of this policy.

3. Roles and responsibilities

NHS Greater Glasgow and Clyde will take all reasonable steps to ensure that employees are aware of this policy.

It is the responsibility of all staff using social media on behalf of NHSGGC to ensure they have read and understood this policy and ensure that they comply with all relevant legislation and associated policies.

The Corporate Communications Directorate has overall responsibility for identifying, monitoring and responding to all matters that can affect the reputation of the organisation. The Directorate is responsible for the official corporate social media accounts of NHS Greater Glasgow and Clyde. These include the NHSGGC twitter account, the NHSGGC Facebook account and the NHSGGC Youtube channel.

The Directorate of eHealth is responsible for information security and use both technology and process to ensure that IT systems perform as expected; that information is provided adequate protection for confidentiality; that system, data and software integrity is maintained; and that information and system resources are protected against unplanned disruptions of processing that could seriously impact the business of the organisation.

All approved users of social media are responsible for ensuring that they have message approval/authorisation arrangements in place and only permit accounts to be managed by those who are competent in the use of social media. They are also responsible for monitoring their accounts and evaluating their effectiveness and for closing down poorly performing sites.

The complaints team are responsible for managing all complaints received through social media. Complaints submitted via NHSGGC social media sites which can’t be resolved locally should be forwarded to the Complaints team at [complaints@nhsggc.scot.nhs.uk](mailto:complaints@nhsggc.scot.nhs.uk) on receipt of the complaint.

Directors and a social media management group (comprising Corporate Communications, eHealth and Human Resources and Organisational Development) are responsible for approving all official NHSGCC accounts.

There are a number of social media accounts which discuss NHSGGC’s services but which are unofficial e.g. unofficial staff forums, campaign pages, community support for services. If a member of staff engages on these sites or is responsible for administering these sites, then they are expected to follow the NHSGGC policy on personal use of social media. They must also make clear that the site is unofficial and is unaffiliated to NHSGGC. If a member of staff raises concerns through such sites, it is expected that they will have first taken these concerns through internal processes.

4. Use of social media for professional/business purposes

1. Use of individual accounts to engage in professional activity

**This section relates to comments made by individual staff identified as NHSGGC employees on social media and in blogs and vlogs.**

NHSGGC recognises and accepts that its staff use social media professionally as individuals working for NHSGGC to share knowledge, to learn, and to engage with fellow professionals.

Every employee is responsible for what they publish online.

Colleagues should exercise caution and common sense before positing as individuals where they can be identified as being an employee or representative of NHSGGC.

When engaging in a professional capacity, individuals should follow the following guidance:

Be professional: Remember that you are a representative of NHSGGC. Be transparent and state that you work for NHSGGC. If you are writing about NHSGGC, use your real name, identify that you work for the organisation and be clear about your role.

Perception is reality: In online social networks, the lines between public and private, personal and professional are blurred. Just by identifying yourself as an NHSGGC employee, you are creating perceptions about your expertise and about NHSGGC among our stakeholders, patients and general public as well as your manager(s) and colleagues. Be sure that all content associated with you is consistent with your work and with the NHSGGC values, priorities and professional standards.

Be credible: Be accurate, fair and thorough. Correct your mistakes and do not alter previous posts without indicating that you have done so. Whenever possible, ask a colleague or your manager to review your postings. This will reduce the number of errors and should also help mitigate against posting incorrect or inappropriate information.

Be safe: Never give out personal details such as home address and phone numbers or other sensitive or confidential information. Do not give undertakings of privacy or confidentiality that the organisation cannot meet. Make sure that contributors are aware that they are not using a secure space. Do not use individual work email accounts when setting up an account but a generic project email address or shared mailbox address. Follow NHSGGC’s policy on safe password practice to minimise risks of security breaches e.g. change the password or a regular basis; do not use an obvious (e.g. QWERTY) password. When changing the password, please inform the [webteam@ggc.scot.nhs.uk](mailto:webteam@ggc.scot.nhs.uk) so they can update their records.

Be compliant: All staff have a responsibility to ensure compliance with relevant NHSGGC polices including the Code of Conduct, Data Protection, Freedom of Information, Bullying and Harassment and patient confidentiality.

Be legal: Stay within the legal framework and be aware that discrimination, libel, defamation, copyright, Freedom of Information, patient confidentiality and data protection laws apply as well as fair use and financial disclosure laws. A defamatory comment is one that is capable of damaging the reputation of an individual or organisation. If successfully sued, you could be liable for costs and damages. Defamation laws also apply to businesses.

Be aware: Always remember that participation online results in your comments being permanently available and open to be republished in other online and traditional media (print and broadcast).

Follow the site’s Code of Ethics: There are numerous codes of ethics for participants in social media, all of which will help you participate responsibly online.

Show respect: Avoid discriminatory, insensitive language or obscenity and do not engage in any conduct that would not be acceptable in the workplace. Do not write posts that are abusive, threatening, harmful, obscene, profane, sexually suggestive, racist, homophobic, sexist or that incite hatred against any group.

Respect privacy: Do not cite or reference NHSGGC staff, stakeholders, or contractors without their approval. You should also show proper consideration for others’ privacy and for topics that may be considered objectionable or inflammatory. No personal identifiable data should be published without the consent of the individual.

Be clear: about the status of content. Make clear that any document or data on an NHSGGC-initiated or administered forum is considered to be held on behalf of NHSGGC for the purposes of the Freedom of Information (Scotland) Act 2002 and may be disclosed in response to requests.

Removal of postings: Whenever removing postings, a copy should be kept i.e. take a screen grab of the post. The copy may be required in the event of a complaint about the moderation of the site. When correcting errors about NHSGGC or an NHSGGC piece of work, be transparent about who you are. Never remove criticism of NHSGGC. Instead, respond to legitimate criticisms in a measured and accurate way.

1. Service/departmental accounts

**This section relates to publishing content and engaging through social networks as an authorised spokesperson for a service/NHSGGC project**.

The policy of NHSGGC is that the corporate accounts maintained by Corporate Communications are the official sites of NHSGGC but that social media can also be used by specific NHSGGC services and departments for professional/business purposes, if authorised.

The corporate accounts should be the first port of call for any member of staff wishing to post information about their service on social media (press.office@nhsggc.scot.nhs.uk).

Any service or department wishing to set up their own social media account must apply for permission to use social media before doing so.

All service/departmental accounts must be approved by the senior manager of the service (director level or equivalent) and by the NHSGGC social media management group before being set up.

When applying to use a social media account, you will be asked to outline: the purpose of the account; the target audience; why social media is the preferred channel for communication or engagement; why the corporate social media accounts do not meet your needs; how this will be resourced, managed, monitored and evaluated; how you plan to interact and deal with queries; confirm that the staff to manage the account are competent in its use; how the information on the site will be monitored and stored for Freedom of Information purposes; and, arrangements for closing the account should it perform poorly.

Each social networking site has its own measurements and tools and these should be used as a minimum to monitor performance.

Authorised users must have a plan in place to monitor and capture the content of social media so that it can be held on NHSGGC systems as part of an information governance audit trail to ensure that the content is not inappropriately omitted from the records of an activity or missed from research or disclosure, e.g. from an FOI request. This is particularly important if the site is used for engagement and consultation as it will form part of the evidence base for decision making.

NHSGGC reserves the right to request the certain subjects are avoided, withdraw certain posts, and remove inappropriate comments.

5. Responding to comments/postings on social media

As a publicly accountable organisation with more than one million patient contacts every year, NHSGGC accepts that our organisation and staff will be the subject of comment and opinion on social networking sites.

There may be instances where video or commentary is posted that goes beyond legitimate, acceptable opinion e.g. a breach of patient confidentiality or a defamatory comment about our staff.

Specific guidance has been produced on how to handle unauthorised photography posted on social media. Refer to the unauthorised patient/visitor photography in NHSGGC healthcare settings if you need advice on dealing with unauthorised photography being posted on social media without the permission of the individual concerned (whether that be colleagues or patients) <http://www.staffnet.ggc.scot.nhs.uk/Corporate%20Services/Communications/Hot%20Topics/Documents/Pictures%20and%20Privacy%20on%20Social%20Media.pdf>

The Corporate Communications Directorate can also support colleagues who need advice on dealing with posts about our staff and services.

6. Freedom of Information

NHSGGC has a legal obligation to comply with the requirements of the Freedom of Information (Scotland) Act 2002 under which a person or organisation is entitled to request information from a public body. NHSGGC has established systems in place to handle FOI requests and has created a dedicated email address through which requests for information can be submitted. However it is still possible that NHSGGC accounts created on social networking sites might be seen as a route through which FOI requests could be submitted.

Staff responsible for monitoring social networking sites should therefore be alert to this possibility and should ensure that the content of all communications sent to NHSGGC through social networking sites are screened to establish whether they constitute a valid request for information and appropriate action taken if necessary. (A valid request must state the name of the applicant and an address for correspondence. It must also describe the information being requested.) Further information on FOI can be accessed through the Board's Freedom of Information Manager or Head of Administration.

7. Governance

All breaches or suspected breaches of this policy must be reported to and investigated appropriately by management in accordance with NHS Greater Glasgow and Clyde Disciplinary Policy and Procedure. Where it is suspected that a breach has occurred whilst using NHS IT systems, including mobile computing or removable storage media, then the NHSGGC IT Security Policy, NHSGGC Internet Acceptable Use Policy, NHSGGC Mobile Devices, Data Breach Policy and Media Policy should also be consulted. Advice should also be sought from Human Resources.

Should there be evidence to suggest that an employee has not adhered to the standards set out within this policy, then disciplinary action may be taken against them in accordance with the NHS Greater Glasgow and Clyde Disciplinary Policy and Procedure. In certain circumstances this may lead to termination of the contract of employment and/or legal action taken against the individual.

8. Copyright, Designs and Patents Act 1988

The act gives creators of literary, dramatic, musical, artistic works, sound recordings, broadcasts, films and typographical arrangement of published editions, rights to control the ways in which their material may be used. It is an offence to copy, broadcast and perform these works without the consent of the owner.

If you want to publish photographs/videos and other works on social media, you must have the legal rights to do so.

All images to be used should therefore be either Crown Copyright, Creative Commons or other permission or license to publish or re-use on social media or have the permission of the owner to publish on social media.

If in doubt about copyright ownership, do not use material.

9. Photography

Every person who features in the photography/video that is created by NHSGGC for publication must have agreed to have his or her photo published online and completed a written consent form to confirm consent. Please note that all images on the NHSScotland Photolibrary [www.nhsscotlandphotolibrary.org](http://www.nhsscotlandphotolibrary.org) come with this consent.

All images used should aim to portray real life in NHS Scotland and should depict an honest, positive image of a modern and diverse organisation. Images should show realistic situations, with premises, equipment and dress arranged in accordance with current policies/best practice. Care must be taken to conform to the current dress code and uniform policies for NHS staff, for example, picture showing doctors in white coats with stethoscopes round their necks must not be used.

10. Malware

Usage of social media significantly increases the likelihood of malware (such as viruses, Trojans and worms) being imported into NHS networks even where robust anti-virus measures are in place. Anti-virus software is run on all NHSGGC computers however threats exist on social networking sites that NHSGGC does not have technical controls to mitigate.

Users must:

• Use a strong, hard to guess password on the SNS

• Be extremely cautious in following links posted by members of the public

• Be extremely careful if formatted text appears as a posting it could represent malware.

• Never install an executable programme

• Beware of phishing attacks – questions that may cause you to compromise some personal information

• Check that information that you have posted has not been altered without your approval – web sites are often compromised and a malicious person may have changed your postings.

11. Review of policy

Due to the pace of development of social media, this policy will be reviewed yearly unless the introduction of any new or amended relevant legislation or changes to the security structure of any social networking site warrants earlier review.

12. Communication and implementation

The policy will be communicated via StaffNet and the other internal communications tools and through the Information Governance and IT Security Framework.

Appendix A

***Is social media right for you?***

What to consider when making an application.

Good use of social media can help us better understand, respond to and attract the attention of specific audiences. It enables two-way communication with people in the places where they are already engaging with their interests.

Social media can:

* Increase access to audiences and improve accessibility of communication
* Enable us to be more active in our relationships with partners and stakeholders
* Offer greater scope to adjust or refocus communications quickly, where necessary
* Improve the long-term cost effectiveness of communications
* Increase the speed of feedback and input
* Reach specific audiences on specific issues
* Engage with specific ‘virtual’ communities
* Reduce our dependence on traditional media channels

Benefits and opportunities

* Democratic participation and engagement, increased transparency
* Knowledge sharing
* Collaboration and co-production (between staff, between the organisation and stakeholders)
* Faster, multiple ways of disseminating/sharing information
* Access via mobile devices/from many locations
* Fits with existing culture of networks and encourages and facilitates creation/expansion of professional networks
* Education/continuous professional development

Using it effectively

* Go to where people already are – don’t reinvest the wheel (don’t forget - the NHSGGC corporate accounts already have large audiences of professionals and the public)
* Successful communities already exist – create the tools to engage with them
* Plan around your audiences’ needs
* Variety of integrated channels works best (no single solution fits all needs)
* Be clear what you are using it for and what benefits it will bring for your service and/or the organisation
* Content should be accurate, relevant, focussed and professional
* Mistakes should be rectified swiftly and acknowledged

Challenges and limitations

* No social media sites are fully secure. Be conscious that any content placed on them may be seen by people other than the intended audience and must be considered as public.
* Managing reputation in a setting which is meant to encourage discussion and comments needs careful consideration.
* There are significant resource implications in terms of managing and responding to comments and online discussion.
* Social media is not generally backed up in the same way as internally networked services.
* Robust information governance is needed to ensure that content created on social media is not inappropriately omitted from the records of an activity or missed from research or disclosure, e.g. from an FOI request

Keeping it under review:

* Social media may seem like an easy solution to your needs to engage, learn and communicate but it can be resource intensive and resource - which includes our time - is just too precious to spend on activities and channels which don't provide a positive return. It is therefore vital that you keep it under review and evaluate it.
* Measurement should include: outputs, engagements, knowledge from outside the platform, outcomes

Helpful resources when considering an application:

<http://comms2point0.co.uk/comms2point0/2017/4/22/beware-of-the-tick-box-twitter-account>

<http://www.skillsforhealth.org.uk/news/latest-news/item/534-new-healthcare-social-media-toolkit-helping-you-connect>

<http://comms2point0.co.uk/comms2point0/2017/5/8/i-reviewed-500-social-media-accounts-want-to-know-what-i-learned>

<https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/internetaccesshouseholdsandindividuals/2016>

Appendix 2

**Application for official NHSGGC social media account**

|  |  |
| --- | --- |
| **Name and designation of applicant** |  |
| **Name of Project/Service/**  **Department** |  |
| **Directorate** |  |
| **Sponsor (director or equivalent senior manager)** | Name:  Signature: |
| **Which social networking site(s) do you want to use** |  |
| **Purpose of site (please delete as appropriate)** | Service promotion ................................  Learning/education ..............................  Professional network ...........................  Patient engagement ............................  Patient support ....................................  Public engagement/  Consultation ........................................  Other (please state) ........................... |
| **Objectives of social media account** |  |
| **What is your case for a dedicated social media account instead of using the corporate accounts?** |  |

|  |  |
| --- | --- |
| **What benefits and opportunities will a social media account bring?** |  |
| **How do you anticipate liaising with the corporate NHSGGC social media accounts?** |  |
| **Name of staff who require access to manage the account.**  **(\* all staff require to be competent in use of social media)** |  |
| **Please outline the type of content you will publish on the site, if approved** |  |
| **Frequency at which the social network site will be moderated/updated** |  |
| **How do you plan to interact and deal with queries?** |  |
| **How will you store the content of your social media site for future reference?** |  |
| **What potential risks do you foresee?** |  |
| **How will you manage these risks?** |  |
| **How will you monitor and evaluate the account?** |  |

Any other supporting information: …………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………………….

Signature of applicant: ......................................................

Date submitted: .................................................................

Date considered by social media management group: .............................................

Outcome: ..........................................................................