

Social Media Policy



Please complete the table below:	
<i>To be added by corporate team once policy approved and before placing on website</i>	
Policy ref no:	28
Responsible Executive Director:	Shane Devlin (via Jen Hartley-Bond)
Author and Job Title:	Rachelle Muchall - Digital Communications Manager
Date Approved:	21 September 2023
Approved by:	Shane Devlin CEO
Date of next review:	September 2024

Policy Review Checklist

	Yes/ No/NA	Supporting information
Has an Equality Impact Assessment Screening been completed?	Yes	Completed on 09/03/23
Has the review taken account of latest Guidance/Legislation?	Yes	Guidance from NHS England on social media policy and monitoring.
Has legal advice been sought?	N/A	
Has HR been consulted?	Yes	HR consulted via document review by Rob Hayday and discussion in the Corporate Policy Review Group.
Have training issues been addressed?	N/A	
Are there other HR related issues that need to be considered?	Yes	This policy links with the ICB's Disciplinary Policy and the Bullying and Harassment Policy.

	Yes/ No/NA	Supporting information
Has the policy been reviewed by Staff Partnership Forum?	N/A	
Are there financial issues and have they been addressed?	N/A	
What engagement has there been with patients/members of the public in preparing this policy?	N/A	
Are there linked policies and procedures?	Yes	See page 16
Has the lead Executive Director approved the policy?	No	Yes
Which Committees have assured the policy?	N/A	
Has an implementation plan been provided?	Yes	See page 17
How will the policy be shared with staff/public?		See implementation plan
Will an audit trail demonstrating receipt of policy by staff be required; how will this be done?	N/A	
Has a DPIA been considered in regards to this policy?	NA	CRPG confirmed that no requirement necessary
Have UK General Data Protection Regulation (UK GDPR) / Data Protection Act 2018 implications have been considered?	Yes	

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Social Media Policy

1 Introduction

NHS Bristol, North Somerset and South Gloucestershire Integrated Care Board (ICB) strongly supports the use of social media as a positive communication channel to enable a dialogue with the public and to provide members of the public with information about what we do and the services we commission.

This policy provides instructions for all Bristol, North Somerset and South Gloucestershire ICB staff on the use of social media and attributed digital content.

This policy makes explicit reference to X (formerly known as Twitter), Facebook, and Instagram and LinkedIn; however, it applies to all social media platforms. It seeks to give direction to ICB staff in the use of social media and help them to understand the ways they can use social media to help achieve business goals.

The ICB uses social media to provide opportunities for genuine, open, honest, and transparent engagement with stakeholders; giving them a chance to participate and influence decision making. These tools are used to build online communities and networks in which the ICB plays the role of facilitating peer to peer interactivity.

We are keen to support and facilitate our staff to use social media to promote the work of the ICB and Healthier Together and to encourage patient, public and stakeholder involvement in our work.

1.1 BNSSG ICB values

The Social Media Policy supports the values of the organisation by sharing our work with our stakeholders and providing them with the opportunity to comment and respond to our communications.

2 Purpose and scope

The purpose of this policy is to:

- provide guidelines for using the ICB's corporate social media accounts
- provide direction for ICB staff using their own professional social media accounts

- be clear about the ICB's stance on the use of social media for professional use
- inform staff on how they can avoid risking damage to the ICB's reputation with the use of their private social media accounts.

The objective is to make sure that everyone connected with Bristol, North Somerset and South Gloucestershire ICB can use social media in a way that protects them and the reputation of the ICB and the wider NHS. The objective is also to make sure that the ICB and wider NHS are not brought into disrepute.

The aims of this document are to:

- provide clarity to staff on the use of social media tools when acting independently or as a representative of the ICB and give them the confidence to engage effectively
- ensure that the organisation's reputation is not brought into disrepute and that it is not exposed to legal risk; and
- ensure that audiences can distinguish official corporate ICB information from the personal opinion of staff

This policy applies to all staff employed by Bristol, North Somerset and South Gloucestershire ICB or who are associated with, or represent the ICB, including Board members, those on temporary or honorary contracts, on secondments, bank staff, students and independent contractors.

This policy offers direction on acceptable use of social media sites for staff and Board members on behalf of the ICB.

This document is not a social media strategy, or guidance on how to use individual social media tools and platforms. Colleagues wishing to learn more about how to use a specific social media platform, how to set up a professional social media profile or improve an existing one, should speak to the Digital Communications Manager in the communications team.

3 Duties

There is no legal framework for this policy. This policy should be read in conjunction with the Information Governance policy, Standards of Business Conduct policy, and other related policies outlined in section 12.

4 Responsibilities and Accountabilities

The communications team are responsible for managing the ICB corporate social media accounts, including Facebook, X (formerly known as Twitter), Instagram, LinkedIn and Nextdoor. Our corporate accounts include Healthier Together.

The communications team will update and monitor the ICB corporate social media accounts in accordance with our monitoring protocol, the communications and engagement strategy, and guidelines agreed with the ICB. The Deputy Director of Communications and Engagement is responsible for making sure the right arrangements are put in place in the communications team to manage the corporate accounts.

The communications team will receive appropriate training and guidance to operate the ICB corporate social media accounts by the Digital Communications Manager and Digital Communications Officer.

The communications team is responsible for approving any new corporate or team/service/programme social media accounts. The Digital Communications Manager and Digital Communications Officer will provide relevant training and guidance to teams and individuals who are updating or setting up new professional accounts.

The communications team is responsible for taking action on any unauthorised social media accounts - see section 7 for information about this process. The communications team is also responsible for closing any accounts that have been identified as 'fake' - posing as the ICB, Healthier Together or any of the ICB's services, programmes or individuals.

ICB staff can post about the ICB or Healthier Together using their own professional social media accounts, following liaison with their line managers and the communications team.

Staff are expected to exercise caution, discretion and use common sense when using social media. Staff are also expected to give proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory, such as politics and religion. Staff are expected to use social media in an acceptable way – further information is outlined in section 5.

Staff should escalate to the communications team in the first instance if they are directly contacted on social media about an FOI request or formal complaint about the ICB or any of our services or programmes.

Line managers are expected to provide support for colleagues experiencing adverse impacts resulting from work related social media use and utilising existing arrangements such as the Employee Assistance Programme and Mental Health First Aiders.

5 Definitions/explanations of terms used

Social media: websites and applications that enable users to create and share content or to participate in social networking.

Corporate social media account: social media accounts for which the ICB is named as the owner of the account.

Staff or team/service/programme professional account: a social media account whereby the user identifies themselves as a member of ICB staff or team at the ICB and publishes posts about their work at the ICB. The purpose of a professional account would be to engage with a specific professional or public audience, raise the profile of the ICB, or increase transparency around the work of the ICB.

Personal account: a social media account used by a member of ICB staff, but which is not recognised by the ICB for use to publish posts related to their work at the ICB.

6 Participating in online activities

Staff are our best ambassadors. Many already use social media, interactive and collaborative websites and tools, both in a personal and professional capacity. Rather than try to restrict this activity, the ICB wishes to embrace it as a demonstrable element of our commitment to a culture of openness.

The communications team will provide guidance and training to empower staff to interact online in a way that is credible, consistent, transparent, relevant and safe.

We recognise that there is a blurred line between what was previously considered 'corporate social networking', which could be useful to the business, and 'social networking', which is for personal use, to an extent where it may no longer be possible, or desirable, to make that distinction. For example, there is a tendency for people to maintain just one X (formerly known as Twitter) account, which is used to post a mixture of business-related professional content and personal content.

However, posts made through personal accounts that are public can be seen and may breach organisational policy if they bring the organisation into disrepute. This includes situations in which an individual could be directly or indirectly identifiable as an ICB employee whilst using social networking tools; or occasions when an individual may be commenting on ICB related matters on social media. Therefore, staff should exercise caution when posting content on social media using their private accounts even if there is no direct reference to their employment with the ICB on their profile.

Employees should be mindful that any behaviour that may damage the reputation of the ICB or brings the organisation into disrepute may result in an investigation and subsequent disciplinary sanction under the ICB Disciplinary Policy.

7 Acceptable uses of social media

Staff should use their own discretion in order not to conflict with corporate messages or bring the organisation into disrepute when using social media. The following guidance gives some general rules and best practices which should be always abided by:

When using a professional staff account or an account on which you have identified yourself as an employee of the ICB:

- Know and follow standards and conduct that are expected of all ICB staff. The same principles and guidelines that apply to staff activities in general also apply to online activities.
- If using an individual professional staff account, staff should identify themselves by giving their name and role at the ICB. Staff should write in the first person and must make it clear that they are speaking for themselves and not on behalf of the ICB.
- Staff should refrain from entering any online social networking activity for commercial gain.
- When using a professional staff account or speaking in relation to your role at the ICB, do not give any individual health advice, instead signpost people to official sources such as the ICB, NHS.UK or their own GP.
- Do not give any individual health advice, instead signpost people to official sources such as the ICB, Healthier Together, NHS.UK or their own GP.
- Respect the audience. Do not use personal insults, obscenities, or engage in any conduct that would not be acceptable in the workplace. Staff should also show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory, such as politics and religion.
- Do not cite or reference ICB suppliers.
- Try to add value. Provide worthwhile information and perspective. The NHS brand is well respected and enhanced by its people. What staff choose to publish may reflect on the ICB's reputation or the NHS as a whole.

When using any social media account, including personal:

- Employees are personally responsible for the content they publish on social media. Staff should be mindful that what they publish will be public for a long time. When online, staff should use the same principles and standards that they would apply to communicating in other media with people they do not know.

- Be aware that followers may be colleagues, clients, journalists or suppliers. It is also possible that people may not be who they say they are and staff should bear this in mind when participating in online activities.
- Respect copyright, fair use, data protection, defamation, libel and financial disclosure laws.
- Do not provide the ICB or another's confidential or other proprietary information on social media. Do not publish or report on conversations that are private or internal to the ICB.
- Comply with Data Protection legislation and the Health and Social Care Act 2012 by not publishing any personal information.
- If commenting on a thread about the ICB or ICB related matters, staff should identify themselves by giving their name and, when relevant, role at the ICB. Staff should write in the first person and must make it clear that they are speaking for themselves and not on behalf of the ICB.
- Don't use social media in any way to attack or abuse colleagues. The same principles and guidelines of the ICB's Bullying and Harassment policy also apply to online activities. This policy is available on the ICB intranet.
- Don't use social media in any way to discriminate or direct hate speech towards colleagues.
- When using a personal social media account, staff should be aware of their association with the ICB. If staff identify themselves, or are identifiable, as an employee of the organisation, they should ensure their profile and related content is consistent with how they wish to present themselves to colleagues and stakeholders. Staff should be aware that they may be identified as an employee by any public use of their NHSmail email address.
- Staff, unless authorised to do so, should not comment on social media about a major incident or other emergency situation, such as a major transport accident or terrorist act. At such times, the public risk from misinformation and speculation is heightened and staff members should take extra care to support the role of official communications channels.
- If staff are contacted by a representative of the media about posts they have made, they should contact the communications team in the first instance on 0300 123 4476 or email bnssg.communications@nhs.net.
- If staff have made a mistake, they should not be confrontational, but aim to be the first to correct it. Where a mistake poses a risk to the ICB's reputation, staff should raise this with the communications team as soon as possible to produce an appropriate response irrespective of the type of social media account used.

Staff who have concerns about their position on any of the issues covered by this policy should contact the communications team on 0300 123 4476 or email bnssg.communications@nhs.net

7.1 Establishing an official presence on social media

It is important that the time and effort staff spend on a professional staff or team/service/programme social media account is justified by the value to the business. Social networking platforms can offer many opportunities to reach specific audiences but there are also potential pitfalls which staff must be careful to avoid.

If a team, programme or service within the ICB wishes to establish an ICB presence on X (formerly known as Twitter) they must seek approval from their line manager and discuss the proposal with the communications team in the first instance. The communications team will provide advice on the types of things they will need to consider, such as: time and resources needed to implement, timeframes, risks and issues, exit strategy and how to link this activity to the overall business plan for a programme or business area, and stakeholder consultation and approvals.

Whether a new professional team social media account is approved is ultimately the decision of the communications team.

Unauthorised social media accounts or blogs set up by staff members on behalf of the ICB's services or programmes will be flagged and reviewed by the communications team for approval, and escalated to the relevant Executive Director if they raise concerns.

Any accounts that have been identified as 'fake' - posing as the ICB, Healthier Together or any of the ICB's services, programmes or individuals - will be closed down by the communications team.

7.2 Retweets or sharing posts

If staff choose to share posts on professional staff accounts they need to be aware that this might not be endorsed by the wider organisation.

The ICB corporate or team accounts may retweet or share news, links and personal observations that are relevant to the work of the ICB. These may be from patients, other NHS organisations, partner organisations, third sector organisations and interested individuals, such as NHS colleagues, partners, health service policy makers and activists, local and national politicians and The UK Health Security Agency (UKHSA) personnel.

Inappropriate messages or content promoting commercial organisations products and services should not be retweeted or shared, and we must not show favouritism to political parties and/or politicians. During pre-election periods, staff should take particular care not to retweet or share content that could be deemed political.

7.3 Following other social media users

The ICB's decision to follow a particular social media user on our corporate accounts does not imply endorsement of any kind. The ICB corporate accounts follow accounts on social media that we believe are relevant to our work. This could include

following the social media accounts of companies and other commercial enterprises (and/or their employees) who comment on ICB and Healthier Together related issues.

7.4 Replies and direct messages received via social media channels

The communications team will read all comments, @Replies and Direct Messages sent to the team and, when possible, will respond to them as appropriate following consultation with the respective department and in line with our internal protocols. This includes Freedom of Information Requests (FOIs) and complaints, and contact of a personal and sensitive nature.

If staff are directly contacted on social media about an FOI request or formal complaint about the ICB or any of our services or programmes, they should escalate this to the communications team in the first instance.

7.5 Dealing with prolific and/or consistently negative users

The ICB reserves the right to not respond should a user be overly prolific, consistently negative, or use abusive or offensive language. If content in any format (such as comments, videos, images, GIFs, attachments, links or emojis) is offensive or targets abuse at a person or group, the communications team will report and delete it if the platform allows, if not, hide it and report it – the ICB has a zero-tolerance policy for abuse on our posts. If content on one of our posts is deemed mis-information or mis-leading, the communications team reserves the right to hide or delete it.

If we see frequent offensive, abusive or misleading posts by a user, we will take action to block their access to our social media accounts.

Staff requiring support around abusive, offensive or discriminatory social media posts should seek support from their line manager or Occupational Health. Advice can also be sought from HR.

If concerns are raised about the work of the ICB, the communications team will escalate this to the relevant department and will provide a link to any statements the ICB has produced on the discussion topic. Wherever possible, the ICB will also incorporate social media into communications plans to ensure it is being proactively used.

Due to the nature of the work of the ICB, it is inevitable that there will be some negative comments circulating on social media. However, if a member of staff is made aware of any misconduct taking place on social media or comments that directly impact our work, they should escalate this to the communications team.

8 Training requirements

There is no specific training requirement associated with the implementation of this policy for ICB staff. The communications team will receive appropriate training and guidance to operate the ICB social media accounts by the Digital Communications Manager and Digital Communications Officer.

9 Equality Impact Assessment

An Equality Impact Assessment (EIA) screening has been completed for this policy and is available as appendix 13.1.

All relevant persons are required to comply with this document and must demonstrate sensitivity and competence in relation to the nine protected characteristics as defined by the Equality Act 2010. The Act prohibits discrimination on the basis of age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex or sexual orientation. It also means that each manager or member of staff involved in implementing the policy must have due regard to the need to: eliminate unlawful discrimination, harassment, victimisation; advance equality of opportunity between those who share a protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not.

If you, or any other groups, believe you are disadvantaged by anything contained in this document please contact the Document Lead (author) who will then actively respond to the enquiry.

A copy of this policy in alternative formats is available on request. Please email bnssg.communications@nhs.net.

10 Implementation and Monitoring Compliance and Effectiveness

The communications team will be responsible for implementing, monitoring compliance with, and the effectiveness of, this policy.

Monitoring may include:

- Following or 'liking' relevant staff and team accounts using the ICB's social media accounts.
- Tracking the use of keywords, such as the ICB and Healthier Together name or relevant topics, on social media platforms.
- In exceptional circumstances, observing individuals' accounts to protect ICB, Healthier Together and/or NHS reputation.

Staff should remember that they are ultimately responsible for what they publish online and that there can be consequences if this policy is not adhered to.

Non-compliance with this policy may lead to disciplinary action in accordance with the ICB Disciplinary Policy. Staff are reminded that actions online can be in breach of their contract of employment.

IT/Equality policies and any online breaches of these policies may also be treated as conduct issues in accordance with the Disciplinary Procedure.

11 Countering Fraud, Bribery and Corruption

The ICB is committed to reducing fraud in the NHS to a minimum, keeping it at that level and putting funds stolen through fraud back into patient care. Therefore, we have given consideration to fraud and corruption that may occur in this area and our responses to these acts during the development of this policy document.

ICB employees should be aware of the consequences of using social media platforms to post content which conflicts with information provided to the ICB, including their health and fitness to work, and secondary employment (for example, posting evidence of undertaking unapproved secondary employment whilst receiving sick pay from the ICB). If an instance such as this occurs, an employee may be subject to criminal or disciplinary proceedings, which could result in dismissal.

12 References, acknowledgements and associated documents

There are other related Bristol, North Somerset and South Gloucestershire ICB policies that all employees should be aware of before undertaking any social media activity. The key linked policies are:

- Information governance policy
- Bullying and harassment policy
- Disciplinary policy
- Freedom of information policy
- Freedom to speak up policy
- Confidentiality and security of information policy
- Acceptable use of IT policy
- Social media monitoring protocol, which is by managed the Digital Communications Manager

13 Appendices

13.1 Implementation Plan

Target Group	Implementation or Training objective	Method	Lead	Target start date	Target End date	Resources Required

All Staff	Ensure that all staff are made aware of the policy and its contents.	The policy will be communicated through The Voice internal staff newsletter as part of launch.	Communications team	04/10/23	04/10/23	Send policy to Internal Communications Team for inclusion
All Staff	Ensure that all staff have access to the policy and its contents.	The policy will be place on the Hub for access.	Communications team	25/09/23	-	Send policy to Internal Communications Team for inclusion
ICB Board	Ensure senior leaders are aware of their responsibilities when using social media	Policy to be circulated by the Corporate Team via email to all members, who must respond to confirm that it has been received and read	Corporate team			
New and returning staff	Ensure that all managers make new starters aware of the policy as part of their induction.	Information to be included in the Manager's Briefing. Reference to policy to be added to new starter checklist.	Communications team	25/09/23		Send policy to Internal Communications Team for inclusion

13.2 Equality Impact Assessment