

Social media policy



Please complete the table below:

To be added by corporate team once policy approved and before placing on website

Policy ref no:	28
Responsible Executive Director:	Deborah El-Sayed
Author and Job Title:	Ben Anstis, Interim Digital Communications Officer Katharine Barker, Interim Digital Communications Manager
Date Approved:	June 2020
Approved by:	Sarah Truelove Deputy Chief Executive Officer and Chief Finance Officer
Date of next review:	June 2022

Policy Review Checklist

	Yes/ No/NA	Supporting information
Has an Equality Impact Assessment Screening been completed?		
Has the review taken account of latest Guidance/Legislation?		
Has legal advice been sought?		
Has HR been consulted?		
Have training issues been addressed?		
Are there other HR related issues that need to be considered?		
Has the policy been reviewed by Staff Partnership Forum?		

	Yes/ No/NA	Supporting information
Are there financial issues and have they been addressed?		
What engagement has there been with patients/members of the public in preparing this policy?		
Are there linked policies and procedures?		
Has the lead Executive Director approved the policy?		
Which Committees have assured the policy?		
Has an implementation plan been provided?		
How will the policy be shared with		
Will an audit trail demonstrating receipt of policy by staff be required; how will this be done?		
Has a DPIA been considered in regards to this policy?		
Have Data Protection implications have been considered?		

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Social media policy

1 Introduction

NHS Bristol, North Somerset and South Gloucestershire Clinical Commissioning Group ((CCG) strongly supports the use of social media as a positive communication channel to provide members of the public with information about what we do and the services we commission.

This policy, which has been extracted from the NHS England social media policy and tailored for the CCG, provides instructions for all Bristol, North Somerset and South Gloucestershire CCG staff on the use of social media and attributed digital content. For the purpose of this policy, the definition of social media is websites and applications that enable users to create and share content or to participate in social networking. This policy makes explicit reference to Twitter, Facebook, and Instagram, however this policy applies to all social media platforms in an ever changing digital world. It seeks to give direction to CCG staff in the use of these tools and help them to understand the ways they can use social media to help achieve business goals.

The CCG 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 CCG 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 CCG and to encourage patient, public and stakeholder involvement in our work.

1.1 BNSSG CCG 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 CCG's corporate social media accounts
- provide advice for CCG staff using their own professional social media accounts
- be clear about the CCG's stance on the use of social media for professional use
- inform staff on how they can avoid risking damage to the CCG'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 CCG can use social media in a way that protects them and the reputation of the CCG.

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 CCG 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 are able to distinguish official corporate CCG information from the personal opinion of staff.

3 Duties and responsibilities

This policy should be read in conjunction with the Information Governance Policy and Standards of Business Conduct policy, which are available on the CCG website.

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

This document offers guidance and some rules on acceptable use of social media sites for staff and Governing Body members on behalf of the CCG.

This document is not a social media strategy, or guidance on how to use individual social media tools and platforms. Each business area should assess the value of using these tools in an official capacity, and follow this policy if they decide to do so.

The CCG will use social media platforms to communicate clearly, quickly and in an engaging manner to people interested in our work.

The CCG's Twitter account will be managed by the communications team. CCG staff, following agreement from their line managers and the communications team, can also tweet about the CCG using their own professional twitter accounts. A professional account is defined as a social media account whereby the user identifies themselves as a member of CCG staff and publishes posts about their work. The purpose of a professional account would be to raise the CCG's profile, engage with a specific professional or public audience or increase transparency around CCG work.

The CCG Facebook and Instagram accounts will be managed and updated by the communications team. CCG Staff can follow and 'like' the page and share posts.

The communications team will update and monitor the CCG social media accounts in accordance with guidelines agreed with the CCG.

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.

4 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 account: social media accounts for which the CCG is named as the owner of the account. This includes accounts that relate to a particular area of the CCG's work, rather than to the CCG generally.

Staff professional account: a social media account whereby the user identifies themselves as a member of CCG staff and publishes posts about their work at the CCG.

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

Purdah: the period prior to an election when specific restrictions are placed on the use of public resources and the communication activities of public bodies, civil servants and local government officials

5 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 CCG 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 an increasingly 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 Twitter account, which is used to post a mixture of business related 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

a CCG employee whilst using social networking tools; or occasions when an individual may be commenting on CCG related matters on Twitter.

Staff should exercise caution when posting any content on social media using their private accounts even if there is no direct reference to their employment with the CCG on either their profile or the content they have posted. Employees should be mindful that any behaviour that may damage the reputation of the CCG, is defamatory or brings the organisation into disrepute may result in an investigation and subsequent disciplinary sanction under the CCG Disciplinary Policy.

6 Acceptable uses of social media

Staff should use their own discretion and common sense when using social media tools. The following guidance gives some general rules and best practices which should be abided by at all times:

- Know and follow standards and conduct that are expected of all CCG staff. The same principles and guidelines that apply to staff activities in general also apply to online activities.
- 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.
- Staff should identify themselves by giving their name and, when relevant, role at the CCG if they are discussing the CCG or CCG related matters. Staff should write in the first person and must make it clear that they are speaking for themselves and not on behalf of the CCG.
- 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 CCG 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 CCG.
- Do not cite or reference partners or suppliers.
- Comply with Data Protection legislation and the Health and Social Care Act 2012 by not publishing any patient information.
- Do not give any individual health advice, instead signpost people to official sources such as the CCG, NHS Choices 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.

- Don't use social media in any way to attack or abuse colleagues. The same principles and guidelines of the CCG's Bullying and Harassment policy also apply to online activities. This policy is available on the CCG intranet.
- Staff should be aware of their association with the CCG when using online social networks. 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 should refrain from entering any online social networking activity for commercial gain when using their professional account.
- 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 CCG's reputation, staff should raise this with the communications team as soon as possible in order to produce an appropriate response irrespective of the type of social media account used.
- 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 CCG's reputation or the NHS as a whole.
- 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 Establishing an official presence on social media

It is important that the time and effort staff spend on social media 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 member of staff wishes to establish a CCG presence on 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.

Unauthorised social media accounts or blogs on behalf of the CCG's services, programmes or individuals will be closed down by the communications team.

8 Retweets or sharing posts

Tweets that the CCG retweets or posts that are shared do not imply endorsement on the part of the CCG. If staff choose to share posts they need to be aware that this might not be endorsed by the wider organisation.

The CCG may retweet or share news, links and personal observations that are relevant to the work of the CCG. 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 Department of Health 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 purdah periods, staff should take particular care not to retweet or share content that could be deemed political.

9 Social media as a source of official policy

Social media posts should not be considered as the authoritative source of new policy from the CCG. Any change or evolution in the CCG's official position on legislation, guidance, investigations and audits will be communicated through more traditional channels: official publications and statements on the CCG website, speeches, and media releases.

Importantly, our decision to share posts should not be taken as explicit endorsement of any position or argument that may vary from the CCG's current official position, nor should it be taken as an indication of a possible shift in the current official position.

10 Following other social media users

The CCG's decision to follow a particular social media user does not imply endorsement of any kind. The CCG follows accounts on social media 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 CCG related issues.

11 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.

Freedom of Information (FOI) requests: When an FOI request is received via social media, the communications team will acknowledge the request by responding with: “Thank you for your enquiry. Please provide your contact details to the following address for a formal acknowledgement and response.” The communications team will refer the request to the FOI manager. The FOI team will respond to the request using the contact details provided and will notify the recipient when the FOI response is completed. The response to the FOI will be published on the CCG website and the communications team will inform the individual publicly on the channel they have used that the FOI has been completed and include a link to the published FOI on the website.

Complaints and contact of a personal and sensitive nature: The communications team will advise members of the public that the CCG is not able to manage complaints or comments that include personal or sensitive information via social media and will request that the individual sends details of their complaint to the customer services team. The customer services team will deal with the complaint in line with existing customer services procedures.

Formal complaints and contact of a personal or sensitive nature can be made to the Customer Services Team via the website online form or by writing to or calling the CCG on the contact details listed on the CCG website.

12 Dealing with prolific and/or consistently negative users

The CCG reserves the right to not respond should a user be overly prolific, consistently negative, or use abusive or offensive language. If necessary, the communications team will also report the user to the relevant social media platform. Staff requiring support around abusive or offensive tweets 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 CCG, the communications team will provide a link to any statements the CCG has produced on the discussion topic. Wherever possible, the CCG will also incorporate social media into communications plans to ensure it is being proactively used.

13 Training requirements

No training issues are identified in connection with the implementation of this policy.

14 Equality Impact Assessment

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.

It is not considered necessary to carry out an EIA on this policy, as it does not have an impact on patients, carers or the wider community.

15 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 accounts using the CCG's social media accounts.
- Tracking the use of keywords, such as the CCG's name or relevant topics, on social media platforms.
- In exceptional circumstances, observing individuals' accounts to protect CCG 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 CCG 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.

16 Countering Fraud

The CCG 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.

CCG employees should be aware of the consequences of using social media platforms to post content which conflicts with information provided to the CCG, 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 CCG). If an instance such as this occurs, an employee may be subject to criminal or disciplinary proceedings, which could result in dismissal.

17 References, acknowledgements and associated documents

- Information governance policy
- Bullying and harassment policy
- Disciplinary policy



**Bristol, North Somerset
and South Gloucestershire**
Clinical Commissioning Group

18 Appendices

18.1 Implementation Plan

Dates are provisional. To be updated prior to sign-off.

Target Group	Implementation or Training objective	Method	Lead	Target start date	Target End date	Resources Required
Governing Body	Ensure GB is 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	04/02/2020	04/02/2020	Corporate team time
All Staff	Ensure that all staff are made aware of the policy and its contents.	Policy to be placed on website Information about the policy and CCG process to be placed on The Hub	Communications team	14/02/2020	14/02/2020	Communications team time
All Staff	Ensure that all staff are made aware of the policy and its contents.	Processes within policy to be communicated through internal newsletter. and shared at Stand Up	Communications team	14/02/2020	14/02/2020	Communications team time
All Staff	Ensure awareness of CCG processes and procedures	Awareness raising item at individual Directorate SMT and Directorate team meetings	Disseminated within directorates	05/02/2020	04/03/2020	Communications team time