

Social Media Policy

Document Type (please mark with X):	Policy	x	Guideline		Procedure		Protocol	
Document Author:	Ruth Fry, Head of Communications and Engagement							
Lead Reviewer:								
Lead Executive:	Gareth Adkins, Executive Director, People and Culture							
Ratified by:	Area Partnership Forum							
Date ratified:	16/02/2024							
Review date:	16/02/2027							
Version:	2							
Key words:	<i>Social media, policy, Twitter, X, Facebook, Instagram, YouTube</i>							
OFFICE USE ONLY	Policy ID number	<i>Please leave this blank. This is assigned by the policy library administrator once you submit your final document for upload.</i>						
	Intranet location:							

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Record of Changes

Date	Version	Page	Amendment
22/02/2024	2		New document

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1. Overview and Introduction

Communicating via social media has become part of everyday life for people across the world. The United Kingdom (UK) was home to 57 million active social media users in 2023. That translated to a social media penetration rate of 84 per cent of the population of the UK.

Social media is an increasingly important engagement channel for our organisation, helping us reach a more diverse audience with our messages. Our social media plan enables our organisation to listen to and talk to people across our Highland and Argyll and Bute communities.

All corporate social media is governed through our social media policy, ensuring content is accurate and messaging is timely and co-ordinated.

2. Scope

This policy applies to all NHS Highland staff. Parts of this policy apply to the personal use of social media as individuals. Agency staff, consultants, bank workers and contractors are required to comply with standards outlined in this policy while they are working for NHS Highland.

3. Background

Social media engagement which has not followed our social media policy has the potential to create public confusion and damage our reputation.

As NHS staff we need to remember that what is written on social media sites such as Facebook and X (formerly known as Twitter) is public and ensure that, while posts and blogs are personal to us, they are not upsetting, derogatory or offensive about the services we work in, the people we work with and the service we provide to the public. Posts and blogs also need to respect the same boundaries of confidentiality to patients and colleagues that apply in the workplace. This policy explains how staff should conduct themselves when engaging with social media, and when and how it is appropriate to engage with work topics.

All regulatory bodies have their own set of standards, policies and guidance on use of social media. In addition to following the NHS Highland social media policy, you should comply with your professional body's code of conduct in relation to use of social media.

4. Definitions

Our definition of social media

For the purposes of this policy, 'social media' is defined as websites and applications that enable users to create and share content or to participate in social networking. Social media includes branded platforms like Facebook, TikTok, Weibo, WhatsApp, WeChat, VK, X, LinkedIn, YouTube, Flickr, Snapchat and Instagram, as well as generic online environments such as forums, blogs, podcasts and online news comments boards.

Most people access the internet through mobile devices and the increase in the use of smart phones is allowing people to access the internet with ease. NHS Highland staff should be

aware that these guidelines and related policies and procedures are equally applicable to PCs/laptops and mobile phones and applications.

5. Main Body of the Document

5.1 Staff responsibilities

All staff of NHS Highland are subject to the same responsibilities and standards when using social media. Be sure to:

- Ensure patient confidentiality: patient information should never be shared on social media channels such as WhatsApp
- Have respect for the organisation and your colleagues
- Remember the terms of employment or contract and other [relevant NHS Highland policies](#) apply when engaging with social media
- Remember the requirements of your professional code of conduct with regard to use of social media
- Link with the Corporate Communications colleagues for social media activity which promotes or markets the organisation to mitigate any risks around contradictory or confusing messages on the same topic

However, where staff choose to use social media, this must be compliant with all policies and respect the privacy of others. Staff should also be mindful of their own privacy and protection:

5.2 Privacy

- Review and use privacy settings. Most social media sites allow you to control how visible your information is on that site. You should decide how visible you want your contact and profile information, videos, photos, and other posts to be, and take the time to set the appropriate controls
- In most social media sites, you can limit who can see photos or video tagged with your name. Consider how appropriate any material is before you upload it. Remember that once posted, material may be copied and posted on other sites, even if you delete the original.
- Content posted in a private sphere, viewed only by trusted and approved users can still be screenshotted or shared and posted into a public sphere. So please be considerate of any and all content shared on social media channels in relation to our guidelines. In a private messaging group, on your closed page or on a public account, you should not break NHS Highland's policies. Examples include but are not limited to:
 1. Being abusive or threatening towards colleagues, members of the public or public figures (such as celebrities, political leaders or MSPs)
 2. Discussing, photographing or recording confidential information about patients, service users and colleagues for social media without their informed, explicit permission.
 3. Being discriminatory or abusive to members of the public, your colleagues or public figures in protected groups, which includes for example their gender, sexuality, religion, race or disability.
- Liking, screenshooting, sharing or re-tweeting content on social media can be viewed as endorsement and all users must be mindful of whether this content will be seen as appropriate. Some groups with extreme views post a mixture of content, making it easy for someone to 'like' an innocuous post linked to more inappropriate content.

- Take care when starting fundraising on behalf of the NHS, for example using Just Giving pages or other social media platforms to raise money. Please discuss and seek authorisation from your line manager to ensure fundraising is appropriate and will not undermine or damage NHS Highland reputation, for example through public perception of underfunding .
- Any online activities associated with the work of NHS Highland must be discussed and approved in advance by your line manager and the Head of Communications and Engagement.

5.3 Protection

- Be wary of links sent via social media accounts. Have a healthy suspicion of links sent to you via social media, no matter the source.
- Protect social media accounts from being hijacked. Use strong passwords (Visit the NHS Highland [Cyber Security](#) intranet page for further guidance on passwords along with other cyber security topics).

Material should never be posted which is unlawful or defamatory, which harasses, bullies or stalks another person or which compromises the privacy of others. Doing so may have consequences for employment and could result in legal action. Ignorance is not a defence, so be careful about the content that you post to social media.

- Be wary of social engineering attempts such as ‘fun quizzes’ that can reveal password clues or answers to security questions.
- Keep the device you use to access social media updated with the latest OS versions, patches and security updates.

The following sub-sections outline your responsibilities with regard to personal, professional and official use of social media.

5.4 ‘Personal’ use

NHS Highland employees are free to express their personal views, including political views, on social media but should bear in mind the possibility that this could be construed as damaging the reputation of NHS Highland or undermining public confidence in our services. The extent of damage can be dependent on the nature of the content posted and/or the capacity in which you are writing it.

Think about how your words could be interpreted as well as the context in which you intended them to be read. Any message you post on social media can be spread around the world in a matter of seconds and will possibly be found in real-time searches. Always post with care, as these messages have the power to compromise your safety or your identity and to jeopardise the reputation of NHS Highland.

Be transparent: On your own social media channels, make it clear you are speaking in a personal capacity. You can use a phrase such as, “All views expressed are my own” though you should remember this does not absolve you of your responsibilities to respect others and their right to confidentiality. It is your choice to reveal where you work on social media, but please be aware that doing so carries standards and responsibilities that must be upheld as a representative of the health board.

Be honest: You must not claim to represent the views of NHS Highland unless you have permission to do so as part of your job. Similarly, you must not try to pass off your own

comments or views as being from someone else. Do not ask other people to post on your behalf and do not share confidential information with friends or family.

Be careful: In general it is not advisable to give out personal details such as home address or phone number. Also remember:

- Anything you post online is permanently available and open to being republished in other media.
- When you are taking a photo or video while at work, consider what is in the background. Is there confidential or sensitive information that can be revealed like patient notes? Please be careful and considerate when posting images to social media.
- Don't say anything online that you wouldn't in person or anything that you would not like said to you.
- You may attract media interest in yourself as an individual, so proceed with care whether you are commenting in an official, professional or a personal capacity.

Be discreet: You must not use social media sites to make complaints about your employment. If you want to make a complaint about any aspect of your employment with NHS Highland you must use the [appropriate employment procedure](#).

5.5 'Professional' use

You may sometimes want to comment personally but as an experienced person in your particular field, for example, as a clinician and an expert in your field you may want to comment on an issue that is related to your profession. Or you may see a member of the public asking a question which you can answer. It is fine to engage to give factual information that may be helpful to people. You can also link people to further information on the NHS website or another reliable resource.

As an NHS Highland employee you should make it clear that you are not speaking on behalf of NHS Highland and if registered with a professional body, ensure you comply with any guidelines set by them with regard to confidentiality. Professional use may also cover using social media in your capacity as a trade union representative. In these circumstances, you should ensure the account or post clearly indicates that you are commenting in a trade union capacity, and adhere to your union's guidelines on social media use.

Where possible, try to limit work-related activities on social media if more appropriate tools exist in your workflow. Tools such as Slack, Smartsheets, email, Microsoft Teams are better alternatives. Social Media should not be used to facilitate direct clinical consultation or as a mechanism to communicate with relatives of a patient.

If you find yourself the target of abuse on your personal social media profiles, you can choose to mute or block people. 'Trolls' are generally looking for a reaction, so try not to engage. Contact the NHS Communications Team if you would like further support.

Patients and services users are increasingly asking if they can record or video consultations on their phones and other devices. In some circumstances, permitting or agreeing recordings can be beneficial to the patient/service user where recordings are made openly and consensually. This might be because they struggle to recall detailed information or it may amount to a reasonable adjustment (Equality and/or Disability legislation).

However, it is important that any recordings or posts should not impact or breach on others' privacy. Express consent to record others is required. Examples might be if the recordings

picked up audio from another person or even a visual image or partial image of another which may lead to identification. If images or film taken in a private setting have been uploaded to social media without the permission of the person featured, these can be reported to the social media platform.

Be respectful of your colleagues' privacy: In the interest of privacy and civility, you must be respectful of your colleagues' privacy and not share any of their data including photographs of them without their express permission.

Be diligent: You must not upload confidential or sensitive data relating to individuals, partner organisations or share any aspect of NHS Highland's business on social media without appropriate permission from your manager. Do not tweet pictures of work on a whiteboard or a slide from a presentation unless you have clear permission from the creator or owner of such material. Treat all documents, presentations, conversations and emails as strictly confidential.

Be credible, accurate and fair: Stick to your area of expertise. Seek factual information from an appropriate expert.

5.6 Official use

This specifically applies to NHS Highland employees who manage NHS Highland's social media presence and sets out the general principles.

Be professional: You are a representative of NHS Highland and you should ensure you engage online in the same way as you would in person. In some networks you may be the sole voice of NHS Highland.

Be respectful: Be sure that you communicate in a way that supports NHS Highland policies. Never post information anywhere online that:

- Is unlawful under the Equalities Act 2010
- Damages NHS Highland's reputation or undermines public confidence in NHS Highland
- Supports political activity (other than any required in your role)
- Includes any defamatory material or statements about an individual, company, body or organisation
- Harasses, bullies or stalks another person
- Compromises the privacy of others.

Be helpful: Take responsibility when you see an unanswered query or question and check that it is being responded to in line with the relevant process for that platform.

Be responsive and respectful: Always pause and think before posting. Respect your audience. When disagreeing with other opinions, keep it appropriate and polite. Do not seek out the social media accounts of individuals or groups in order to monitor them: they will tag us in content they want us to see.

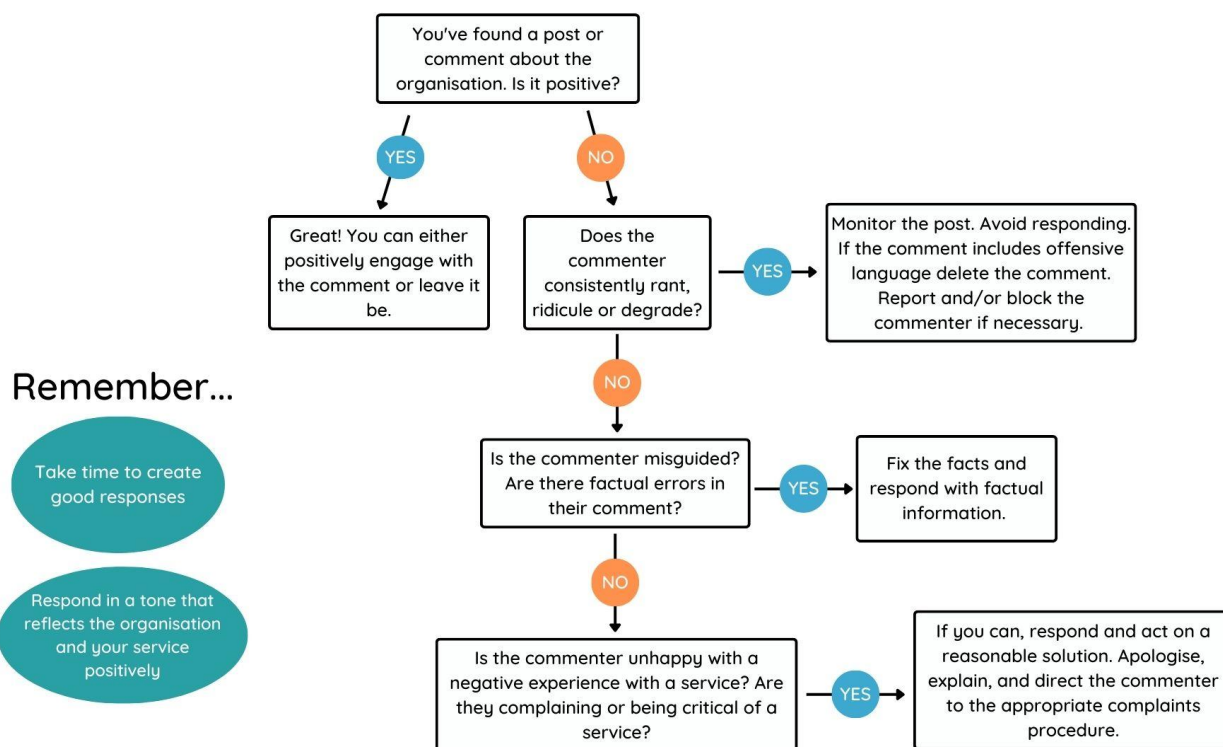
Be accountable: You are responsible for what you say online. You cannot cover up mistakes; you can only seek to correct them. Please remember that libel (an English term), defamation, copyright, freedom of information and data protection laws apply to all materials you post and everything you comment on online. If in doubt, seek advice.

Be responsible: Make sure that anything you post or comment upon meets the standards of conduct of all NHS Highland policies including the [IT Acceptable Use Policy](#) and all HR policies. Links to these can be found in Section 9.

Be compliant: Make sure you comply with NHS Highland’s Data Protection Policy and note that work related posts would fall under any data subject requests for information.

5.7 Handling social media enquiries

Social media is becoming the channel of choice for many people to communicate with NHS Highland. Many people contact NHS Highland to ask a question or highlight a concern/complaint. It is important to respond to social media enquiries in a timely fashion and to direct any complaints and/or questions to the appropriate department.



Remember...

- Take time to create good responses
- Respond in a tone that reflects the organisation and your service positively

5.8 Freedom of Information responsibilities

If you engage on social media platforms in an official capacity, you need to be aware of the possible interactions with FOI/Environmental Information Regulations (EIR) legislation. What you say on a social media platform (and other platforms such as text messages or private email accounts), even if you make the message private, may be subject to access legislation such as [Freedom of Information Scotland Act \(FOISA\) 2002](#) or [Environmental Information \(Scotland\) Regulations \(the EIRs\)](#).

A social media account that has the appearance of being official may be a legitimate way for someone to communicate a request for information. So make sure you monitor any accounts set up to represent an NHS Highland service, or go through an approved process to retire them and shut them down if they’re no longer used.

5.9 Dealing with publishing mistakes

There may be an occasion when something is posted that should not have been – either by mistake or because an account is hacked. If this happens, there are a number of important steps to follow:

- Tell your manager and report the incident to Datix
- If the post generates comments and complaints, explain what happened and apologise
- If possible (i.e. no-one has commented or the post uses bad language) delete the offending post and share with your line manager (after taking a screen grab as a record)
- Agree what you are going to do to limit the chances of it happening again.

In order to mitigate against the mishap in the first place, there are some things you should consider:

- Don't send passwords around by email or any other medium, and follow the account access and password governance. This governance is relevant to each platform and is owned by the platform owner.
- Double check that you are logged in to the right account before posting
- Remember your responsibilities whether you are posting officially, professionally or personally

5.10 Account access and password governance

All staff, including contractors, must follow the [NHS Highland IT Acceptable Use Policy](#), [Information Security Policy and Password and Authentication Policy](#). Social media is a channel where poor password management can and often does have a catastrophic impact on organisations. For this reason there are some additional measures that need to be undertaken to ensure good password governance. Everyone managing a platform should ensure they follow these principles and have a robust and well managed process.

- The NHS Highland IT Acceptable Use policy must be followed by all staff, contractors and consultants
- Every person with an NHS Highland social media account access should be accounted for on a master list
- The master list notes each person's access to social media platforms
- Whenever anyone leaves the organisation who has access to an account, the passwords must be updated immediately
- The password should be secure and comply with the IT Acceptable Use Policy
- Any other reasonable precaution to ensure social media password security is high should be taken and processes and controls should be regularly reviewed and improved in line with any updates and changes to platforms, their use and to technology
- Social media passwords should never be written down. This would represent an increased risk for compromise

6. Roles and Responsibilities

The Communications and Engagement Team is responsible for the operation and oversight of the corporate social media presence and can offer advice and training to other services. Other services are responsible for the operation and oversight of service-led accounts and should take advice from the Communications and Engagement Team on how to do so effectively.

7. Monitoring Compliance and Effectiveness

Any breaches of this policy will be dealt with in line with relevant policies, including as appropriate the NHS Scotland Workforce Bullying and Harassment Policy and the NHS Scotland Workforce Conduct Policy and Conduct Policy for Medical and Dental staff, and may lead to disciplinary action, up to and including dismissal.

8. Consultation Details and Communication Plan

Consultation: List persons / group(s) included in consultation. Indicate whether feedback used / received and no suggested changes (FU), not used (FNU) or not received (NR).

Name/s of person or group	State which corporate services/staff groups the person or group represents	Date	Response: FU/FNU/NR
Communications and Engagement Team	Communications and Engagement Team	May 2023	FU
Listening and Learning Panel	Cross-section of staff groups	May-June 2023	FU
People and Culture SLT	People and Culture SLT	28 July 2023	FU
HR Sub Committee	Staff, including HR colleagues and Staffside	7 December 2023	FU
Area Partnership Forum	Staff, including HR colleagues and Staffside	16 February 2024	FU

Communication plan:

The updated policy will replace the previous version on the intranet, in both the policy library and the Communications and Engagement Team page. An article will be included in the Weekly Round Up reminding staff of the policy.

9. References and Associated documents

Associated Documents

[Equalities Impact Assessment](#)

Other policies/guidance that you may find useful include: -

[Nursing & Midwifery Council Guidance on using social media responsibly](#)

[BMA Guidance Social media, ethics and professional](#)

[General Medical Council Doctors' use of social media](#)

[General Dental Council Guidance on using social media](#)

[Royal Pharmaceutical Society Social media guidance](#)

[NHS Highland social media user guidelines](#)

NHS Highland Policies relevant to this include:

- [NHS Scotland Workforce Bullying and Harassment Policy](#)
- [NHS Scotland Workforce Conduct Policy](#)
- [NHS Scotland Workforce Grievance Policy](#)
- [Data Protection Policy](#)
- [Information Security Policy](#)