

SOCIAL MEDIA POLICY

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1. INTRODUCTION

NHS Lincolnshire Integrated Care Board (ICB) uses social and digital media to provide information and as a way of encouraging open, honest and transparent engagement with stakeholders. We believe that effective use of social media will enhance our brand and reputation, providing essential channels for effective communication.

Our employees are our best ambassadors. Many already use social media, both in a personal and professional capacity. The use of social media is an important channel for professional communication, learning and gaining a work profile. We understand the value that this can bring to individuals and to the organisation.

This policy outlines the ICB's stance on what is acceptable use of social and digital media, including social media/networking and the external use of other online tools.

2. PURPOSE

The purpose of this policy is to:

- protect the reputation of the organisation
- protect employees' interests
- provide guidance for the appropriate use of social and digital media which will enhance the ICB's activities and contribute to the professional development of individual employees.

3. CONTENT

The ICB will use social media platforms, such as Twitter and Facebook, to communicate clearly, quickly and in an engaging manner to people interested in our work.

Our corporate accounts:

- support our corporate objectives.
- promote good news stories about the ICB, ICS and wider partners.
- announce new service developments and examples of innovation and good practice.
- support local, regional and national NHS or government communication and behavioural change campaigns.
- promote key messages about our services.
- give information about changes to services.

4. **CORPORATE USE OF SOCIAL MEDIA**

- The ICB uses social media as part of its communication strategy. The Communications and Engagement Team has authority to speak on behalf of the ICB and is responsible for managing the ICB's official sites, including Facebook, Twitter and Instagram.
- Our social media channels are checked throughout the day between 9am and 5pm.
- Comments and queries received outside of working hours are responded to the next working day.
- Comments requiring input from another department are passed onto the right person to provide an answer directly to the enquirer.
- Employees should not communicate on behalf of the ICB unless this is an accepted normal part of their job, or unless this has been agreed with their manager or the ICB's Communications and Engagement Team. Staff wanting to post news items on existing social media accounts or have suggestions about content related to a team or project, should contact the Communications and Engagement Team.
- If comments are queries posted outside of working hours on any of our corporate social media accounts represent a risk to patient safety or a serious risk to the ICB or ICS' reputation, they should be flagged to the duty communications manager on call, who will respond as appropriate.
- No social media sites, pages or content relating to the ICB should be set up by employees without prior approval. Employees wanting to set up a work related presence on Twitter, Facebook, or any other social networking site, should discuss their proposal with the Communications and Engagement Team in the first instance.
- Opportunities occasionally arise for employees to blog, in an official capacity, on alternative platforms or websites. To ensure that they are appropriate, and provide benefit to the organisation, these opportunities should be discussed, and agreed, with the Communications and Engagement Team.

5. **INTERNAL SOCIAL MEDIA ACCOUNTS**

Our ICB staff Facebook Group is a private group giving staff another platform for staff discussion and information sharing. This forum is available to all NHS Lincolnshire ICB staff.

Staff are asked to follow the rules of engagement when using the platform:

- Be respectful to colleagues.
- Take care not to engage in any conduct that would not be acceptable in the workplace.
- Be tactful. It is ok to be critical of ideas but remember there are other people involved. Be kind and remember to consider the feelings of those who will be

reading your comments. Differences in opinion help us to learn and develop together. Staff are asked to be open-minded to other people's experiences.

- Any inflammatory or derogatory remarks will not be tolerated and will be removed by the moderators.

6. STAFF USE OF SOCIAL MEDIA

- Staff choosing to use social media must be aware that their activity can be traced back to them. The conversations that you take part in and the things that you share about yourself can be enough to identify that you work for the ICB, even if you don't say that in your profile.
- Individuals should take responsibility for protecting their own security online, including but not limited to restricting access to their accounts, blocking unwanted followers and reporting hacked accounts to the platform provider.
- We encourage staff who want to have a presence on social media channels which in some way connects them to our organisation - for example, referring to the ICB or ICS in their profile, interacting with or commenting on ICB and ICS content in a way which indicates they are a member of staff, etc - to do so in a way that upholds our values and maintains or amplifies the work we do to deliver our corporate objectives. This means that social media activity should at the very least not undermine our work to promote positive and supportive health messaging, showcasing best practice, innovations and achievements.
- Comments and content posted by staff on social media channels express the views of the people submitting them. Unless comments are posted by an authorised user of the ICB and ICS' corporate social media accounts, by an approved departmental account, or are retweeted/reposted by the official accounts, these comments don't reflect the view of the ICB or ICS.
- If you publish content to any site/platform outside of NHS Lincolnshire ICB that could be perceived to have a connection to the work you do or subjects associated with NHS Lincolnshire ICB, you must display a disclaimer such as this: "My postings on this site reflect my personal views and don't necessarily represent the positions, strategies or opinions of NHS Lincolnshire ICB."
- If you're approached online by a patient or relative, be clear that social media is not the right way to discuss care or raise concerns and direct them to contact the ICB appropriately. If you are unsure, you should seek advice from your line manager or the ICBs Communication and Engagement Team.
- When using social media, or while online in any capacity, you must not:
 - Reveal confidential information about our residents, patients, staff or the business activities of the ICB or ICS – this includes photographing residents, patients or colleagues without their consent.
 - Comment on anything related to legal matters or complaints. If you're not sure if something's about a legal issue, do not comment at all. This applies to

statements coming from our corporate accounts, and to comments on our corporate channel posts. The Communications and Engagement Team will handle public comments in line with agreed ICB processes.

- Respond on behalf of the ICB to content published by third parties by adding comments. If appropriate, the Communications and Engagement Team will respond to any questions, complaints, media requests and personal issues raised in posts by acknowledging the message and seeking to form a response with the appropriate team. Employees who read something online that they consider to be factually incorrect, inaccurate or otherwise needing an official response from the ICB, should refer the matter to the Communications and Engagement Team.
 - Engage in any activities which might bring the ICB and ICS into disrepute.
 - Use the internet in any way to attack or abuse colleagues, patients or visitors to our sites.
 - Post defamatory, derogatory or offensive comments about colleagues, patients, visitors, your work or the ICB and the ICS.
 - Post defamatory, derogatory, discriminatory or offensive comments that could be perceived as bullying or harassment - please read the ICB Dignity at Work policy.
 - Express grievances about your job, your colleagues or the ICB – instead follow the appropriate policy or procedure including the Grievance policy, Dignity at Work policy or the Freedom to Speak up Policy. All these policies are available on the staff intranet.
 - Respond to requests for interview or opinion by journalists or members of the press – instead follow the guidance set out in the Media policy and direct them to contact the Communications and Engagement Team.
- All social media activity by any member of staff must adhere to the ICB policies on confidentiality and information governance, internet usage, and declarations of interests, gifts, sponsorship and hospitality. Staff are individually responsible for content they post or publish online and should use discretion and common sense in all social media activity.
 - This includes any individually identifiable information about residents, patients or people, including those featured in the background of photos/video footage or other content. Any activity by staff which brings the ICB into disrepute - including posting, re-posting, commenting on or otherwise endorsing inappropriate content - could result in the ICB's disciplinary procedures being invoked.
 - Staff should remember that they are ultimately responsible for what they publish online and that there can be consequences if policies are broken. If you are considering publishing something that makes you even slightly uncomfortable, review the policy above and ask yourself why that is. If you're in doubt or in need of further guidance, please contact the ICB's Communications and Engagement Team to discuss. Non-compliance with the policies associated with this guidance may lead

to formal action employees should always ensure that they are clear about the use of social media and seek further advice as necessary. The ICB reserves the right to take formal action (if after investigation) it is found that the ICBs social media Policy has not been followed by employees.

7. PUBLIC SECTOR EQUALITY DUTY

NHS Lincolnshire ICB aims to design and implement services, policies and measures that meet the diverse needs of our population and workforce.

8. SECURITY - PRIVACY SETTINGS

Employees should take precautions when using social media. It is important therefore to check the privacy settings on your accounts are adequate.

You should carefully consider who you allow to join your network and disclose personal information to. Adjusting your privacy settings on a social networking site will restrict who can access your profile and will therefore prevent strangers finding out personal information about you.

9. OUR SOCIAL MEDIA PRINCIPLES – COMMENT MODERATION POLICY

We want our social media platforms to be a welcoming space where people feel comfortable to talk to us and each other. Therefore, we ask that anyone engaging with our social media channels does so with courtesy, kindness, and respect.

The following moderation guidelines relate to our social media channels. This includes Facebook, Twitter, Instagram, and YouTube.

These guidelines are in place to help create a safe place where you can engage with us, make comments, suggestions and ask questions.

We read all mentions, @ replies, comments, and messages sent to us. We can't always reply to every message we receive but we will get back to you, or pass your message on, where appropriate.

- We aim to reply to messages that require a response on the same or next working day, but we cannot always guarantee this.
- We may ask you to send an email to us with your contact details, or direct you to contact a particular team, especially when it's not appropriate for us to respond via social media. We do this so the right person can follow up with you directly about your question or concern.
- We have guidance for our staff about personal use of social media and how we will support them with this.
- We can't discuss or comment on any individual's care or treatment through social media, because this is confidential information and social media is a public space.

- We won't deal with complaints through social media. There's a process to follow for making a formal complaint, which you can find on our Contact us page.
- We can't answer clinical or medical questions, but we'll do our best to signpost where to get information, advice or support as appropriate.

We believe people are entitled to share their views, and we won't remove a post or block someone just because they say something negative.


However, we will not tolerate posts, messages or comments which:

- Contain hateful or discriminatory comments about things such as disability, race, religion, culture, sexual orientation, gender or identity
- Contain swearing or other profane, defamatory, offensive or violent language
- Are abusive towards members of staff or the public
- Target a member of staff (we do take complaints about our employees very seriously; if you have an issue or concern about an individual please follow our Complaints process.)
- Contain links to inappropriate material
- Discuss illegal activity
- Share someone's confidential or personal information
- Contain irrelevant advertising
- Are mean-spirited or intended to cause offence or hurt

If we believe a post, comment or message directed at us goes against these standards, we may hide or delete the comment and in extreme circumstances block the account that posted it, and/or report it to the social media platform where appropriate. In certain cases, we may send comments to the police or take legal action in the case of threatening, libellous or defamatory posts.

10. SAFEGUARDING

If at any stage you suspect that a child, young person or adult is subject to social media abuse you should raise it in accordance with the ICB Safeguarding Policies and with the ICB Safeguarding Team:

 Tel: 01522 309317 or 01522 309313 (both direct dial)

 Email: LICB.safeguarding1@nhs.net

Mental health crisis support

If you need help and support to access mental health services, please call 0303 123 4000. If you need urgent support or advice you can also call one of our free 24hr helplines:

- Adults – 0800 001 4331
- Children and young people – 0800 234 6342

If life threatening emergency, please call 999.

11. MONITORING AND RELATED DOCUMENTS

Preparation, maintenance and distribution of this document is the responsibility of the Communications and Engagement Team. It is the responsibility of the Communications and Engagement Team to monitor the procedures contained within this Social Media Policy on a regular basis, in order to ensure that all staff are adhering to them.

In the event of a suspected breach of this policy, the organisation reserves the right to initiate further measures, including the ICB's Disciplinary Policy as appropriate.

There are a number of related documents that employees should be aware of. These are as follows:

- Standards of Business Conduct Policy
- Information Governance Policy
- Disciplinary Policy
- Safeguarding Policy
- Equality, Inclusion and Human Rights Policy