



## Social Media Policy

DOCUMENT CONTROL	
<b>Owner:</b>	Head of Human Resources Business Services
<b>Document Control:</b>	HR Business Support
<b>Date Live From:</b>	February 2016
<b>Review/Approval Group:</b>	PPRG and Executive Team
<b>Last Reviewed:</b>	January 2016
<b>Review Due/Cycle:</b>	Every 2 Years

## **Section**

1. Introduction
2. Equality and Diversity
3. Aim
4. Scope
5. Definition of Social Media
6. Use of Social Media at Work
7. The Personal Use of Social Media by Staff
8. Engaging with NHS 24 Social Media
9. Governance
10. Support Contacts
11. Further Guidance
12. Monitoring and Review

## **Appendix 1: Social Media Do's and Don'ts**

## **1 Introduction**

- 1.1 The NHS 24 Social Media Policy provides clear guidance as to what is considered acceptable and unacceptable usage of social media tools. It is intended that this policy will protect the reputation of NHS 24 as well as individual staff members.
- 1.2 Social media has become part of everyday life and a means of communication and sharing information with others. NHS 24 recognises the benefits that social media tools can provide. When discussing NHS 24, NHS Scotland, work or work colleagues, it is important, however, that all staff conduct themselves appropriately and in line with NHS 24 policies and procedures.

The internet is constantly changing so it is not possible to cover all circumstances that may occur. Staff who use social media are required to exercise proper judgement, act professionally and consider the appropriateness for any information or image they post in advance of posting it. The guidelines that follow should be adhered to at all times and in line with other policies and legislation.

- 1.3 This policy has been developed in line with the following policies, which may provide more in-depth guidelines in certain areas:

- Electronic Communications Policy
- Code of Conduct
- Management of Staff Conduct: Disciplinary Policy
- Dignity at Work Policy
- Gender-Based Violence Policy
- Equal Opportunities Policy

- 1.4 NHS 24 aims to create an environment which will allow all staff members to utilise their skills and talents and experience, and thereby encourage a well-motivated and committed workforce. NHS 24 value the contribution made by staff, and will treat all staff with dignity and respect, as an open and accountable organisation.

## **2. Equality and Diversity**

- 2.1 NHS 24 is committed to providing a working environment which is free from harassment, bullying or intimidation of any nature. Every NHS 24 staff member has a responsibility to treat colleagues with dignity and respect irrespective of a person's:

- Race
- Disability,
- Gender reassignment,
- Sexual orientation,
- Sex
- Religion or belief,

- Age,
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Partnership or health status,
- Political conviction,
- Membership or non-membership of a trade union/professional organisation, or
- Real or suspected infection with HIV/AIDS.

2.2 NHS 24 will not condone or tolerate bullying or harassment in any form, including by any electronic communication means.

2.3 Staff being subject to abusive electronic communications should immediately notify their line manager and raise an Adverse Incident Report.

2.4 Staff who create or forward any electronic communication which is deemed to be discriminatory or offensive to any recipient, either internal to NHS 24 or external to NHS 24, will be in breach of this policy.

### **3 Aim**

3.1 This policy aims to provide clear guidelines regarding conduct on social media sites and applications for all NHS 24 staff. The wider aim is to ensure that the reputation of NHS 24 is not compromised through statements made via social media, and that no patient or staff member of NHS 24 is adversely affected by statements made via social media.

### **4 Scope**

4.1 This policy applies equally to all NHS 24 staff, bank workers, agency workers, volunteers, placement workers and contractors. For the purposes of this policy, the term 'staff' relates to all of the above-mentioned groups. This policy is intended to support staff who access social media connected or unconnected to their work. All staff and line managers share the responsibility of appropriate use of social media.

4.2 This policy covers written statements made via social media, as well as pictures and videos uploaded to social media sites and/or applications. The guidelines contained within this policy refer to content placed on social media via:

- computer
- smart phone, or
- tablet device

whether posted whilst on NHS 24 premises or outside of work.

## **5 Definition of Social Media**

5.1 The term 'social media' describes a range of online technologies and practices which are managed and controlled by the users themselves. It allows users to connect with each other and share written material, photographs and videos. This policy applies equally to websites and mobile phone/tablet applications (apps), and includes:

- multimedia networking and sharing technologies (e.g. Facebook, Flickr, Skype, and YouTube)
- information sharing sites (e.g. Wikipedia)
- forums (e.g. Mumsnet)
- opinion sites (e.g. Yahoo! Answers)
- dating sites
- blogs
- personal web pages, and
- all web-based comments, pictures and audio-visual files.

This list is not exhaustive.

## **6 Use of Social Media at Work**

6.1 Staff must not access social media sites or apps during their working hours, with the exception of agreed break, or on NHS 24 devices (other than the designated internet PCs). Where staff bring their own personal mobile devices into work, they must limit their use of these devices to official rest breaks, such as their lunch break.

6.2 The exception to the above is staff who are required to access social media sites for business purposes (through the NHS 24 log-in), and do so with the agreement of their line manager.

## **7 The Personal Use of Social Media by Staff**

7.1 All staff are responsible for any information they make available on social media, whether this was posted during work hours, breaks or when not at work. Further information and guidance on staff 'Do's and Don'ts' is provided in Appendix 1.

7.2 When posting on social media sites, there should be no expectation of privacy, regardless of privacy settings applied to individual accounts. Content uploaded to, and opinions expressed via, social media must be considered to be in the public domain.

7.3 All staff must note that when taking photographs at social occasions relating to work e.g. birthday celebrations or Christmas parties, that they may only publish these photographs, in any form, with the permission of the person or person(s) in the photograph(s). Where photographs of children are taken, e.g. children's Christmas parties inserts to Insight magazine, staff should obtain permission from parents, prior to any photographs being taken. The exception to this is staff who are required to take photographs at business or social occasions for business purposes, and do so with the agreement of their line manager.

7.4 Whilst using social media, staff must not:

- post information about NHS Scotland, its patients, staff or third parties which may be considered confidential, offensive, defamatory, discriminating, harassing, illegal, embarrassing, threatening, intimidating, or which may incite hatred.
- post images, including photographs, of NHS Scotland staff members in the workplace, or patient information.
- post information relating to work, work colleagues, or NHS Scotland in general that may bring NHS Scotland, NHS 24 or individual staff members into disrepute.
- respond to any inappropriate comments or materials placed on to their social networking pages or blogs, by a third party, including sectarianism. NHS 24 is committed to sending a clear message that sectarianism is never acceptable or excusable and staff should report any incidences where sectarianism is identified to their line manager.
- discuss work-related issues and complaints which may potentially damage the reputation of NHS 24 and/or any of its staff, or breach data protection legislation. Any legitimate concerns should be addressed through the appropriate NHS 24 policy, e.g. Grievance Policy, Dignity at Work Policy, and Whistleblowing Policy.
- use their NHS 24 email address to register on a social network site (for more information, please refer to the Electronic Communications Policy). The exception would be social media for business purposes, e.g. LinkedIn, however permission from the staff member's line manager must be sought prior to registering.

7.5 Staff are advised to:

- monitor the content of their social networking pages and blogs, ensuring they comply with the above standards
- ensure that any inappropriate information or material published on their networking pages or blogs is removed immediately and measures put in place to avoid any recurrences
- report to their line manager, all incidences where a third party has placed inappropriate material on to their social network pages or blogs.
- abide by professional codes of conduct (e.g. NMC, HCSCW, etc.)

- be aware that even if they have not disclosed the name of their employer, that comments made or content posted on social media may still have a damaging impact on NHS 24 or NHS Scotland in general
- not to respond to any inappropriate comments or materials placed on to their social networking pages or blogs, by a third party, to prevent any liability on the staff's part

## **8 Engaging with NHS 24 Social Media**

- 8.1 NHS 24 manages its own Facebook and Twitter accounts, which help raise awareness of services and general health related news. Within the parameters outlined in this policy, staff are encouraged to engage positively with NHS 24 through these media channels.

## **9 Governance**

- 9.1 All breaches or suspected breaches of this policy should be reported to line management. These will be investigated in line with NHS 24's Management of Staff Conduct: Disciplinary Policy and/or Dignity at Work Policy as appropriate.
- 9.2 Some breaches of this policy may be deemed to constitute gross misconduct and may result in dismissal. If it is considered that the staff member may have committed offences under civil or criminal law, police involvement may be necessary under the Malicious Communications Act 1988.

## **10 Support Contacts**

- 10.1 Staff who have been subjected to abusive electronic communications can seek confidential advice, support and counselling through the Confidential Contacts found on the staff intranet and the Employee Assistance service, HELP EAP, via:

Telephone: 0800 587 5670 (24 hours per day, 7 days per week)

Website: [www.sg.helpeap.com](http://www.sg.helpeap.com)

Web-based support: <https://www.sg.helpeap.com/index.php/wellbeing-zone>  
(Wellbeing Zone sign up code: SG)

## **11 Further Guidance**

- 11.1 Staff seeking further guidance relating to use of social media are advised to consult any guidelines that may be provided by their relevant professional body, or contact their relevant professional body directly.
- 11.2 Appendix 1 details some “do’s and don’ts” guidelines to provide some useful advice for staff when engaging in social media.

## **12 Monitoring and Review**

- 12.1 In light of the fast-paced nature of social media and changes within these media, this policy will be reviewed no less than once every 2 years, liaising with the Area Partnership Forum and Staff Governance Committee.



## **Appendix 1**

### **Social Media Do's and Don'ts**

#### **NHS 24 Social Media Policy: Staff Guidance – Do's and Don'ts**

Social media is the term used to describe an ever-growing range of interactive, web based communication platforms such as Facebook, Twitter, LinkedIn, MySpace, YouTube, Instagram and many more.

As an NHS 24 staff member, **YOU** are responsible for any information you make available on social media and you could be held accountable if in breach of NHS 24's Social Media Policy. Some breaches of this policy may be deemed to constitute gross misconduct and result in dismissal. In order to limit these risks we have created some "do's and don'ts" guidelines to provide some useful advice when engaging in social media.

#### **Do**

- Take time to read and understand NHS 24's Social Media Policy which can be found on the Policies section of the intranet at:  
<http://intranet/Policies/S/~media/Intranet/Policies/Files/Social%20Media%20Policy%20Feb%202013.ashx>
- Direct any questions regarding the content or application of this policy to your manager or the HR Business Support Team.
- Limit your use of social media to outwith working hours.
- Consider any content uploaded and expressed via social media to be public domain, regardless of your privacy settings – Do you really know who can view your profile? Better to be safe than sorry – ensure that your account(s) have at least some security.
- Remember that content you post could remain in public domain for many years – once it is out there, it is out there!
- Use common sense when engaging in social media. Ask yourself "would I want my manager to see this?"
- Think of how your comments may impact upon the reputation of NHS 24 e.g. saying you've had a bad day at work or making a negative comment about your manager may seem harmless, but could reflect badly on the organisation to potential employees or patients.
- Regularly monitor your social media pages for any content added by others that may be in breach of NHS 24's Social Media Policy. Any such content should be reported to your line manager and removed immediately. You should then put measures in place to avoid any recurrences e.g. removing or blocking the person concerned.

#### **Don't**

- Access social media during working hours or on NHS 24 devices unless you have authority from your line manager to do so, for example purely for work purposes.
- Register to any social media sites/apps using your NHS 24/nhs.net email address.
- Display NHS 24 as your place of employment, with the exception of LinkedIn.
- Post anything which may be considered confidential, offensive, defamatory, discriminating, harassing, illegal, embarrassing, threatening, and intimidating or which may incite hatred.

- Respond to any posts by others relating to the above list of prohibited conduct (any post should be reported to your line manager and deleted immediately).\*
- Post photographs taken in the workplace.
- Share photographs taken at work-related social events, such as staff nights out, of NHS 24's staff or clients without the permission of the person(s) in the photograph(s).

Staff are reminded to speak to their line manager straight away if they have any issues. Content posted to social media sites is considered to be in the public domain and that the NHS 24 Code of Conduct extends to social media for these purposes.

Below are some examples which would result in an investigation being carried out in line with the NHS 24 Management of Staff Conduct: Disciplinary policy.

**Example 1**

On return home from working within NHS 24 a photograph is posted on a social media site of you wearing your NHS 24 name badge when involved in anti-social behaviour.

**Example 2**

Posting a photograph on a social media site which has been taken within NHS 24 premises.

**Example 3**

Referring to colleagues, patients or other staff members in an offensive, defamatory, discriminating, harassing, illegal, embarrassing, threatening, and intimidating manner on a social media site.

These examples are not an exhaustive list but merely highlight examples of when the NHS 24 Management of Staff Conduct: Disciplinary policy would be followed.

Please also see below some brief summaries of recent related cases at Employment Tribunals:

**Discrimination Case**

**Teggart v TeleTech UK Limited**

- Vulgar comments by male about promiscuity of female colleague on Facebook
- Colleague not a Facebook 'friend'
- Constituted harassment of her
- Justified dismissal

**Disrepute Case**

**Crisp v Apple Retail (UK) Ltd**

- Comments posted on Facebook re Apple
- Clear policy – image protection was a 'core value' and derogatory comments on social media was gross misconduct
- 'no reasonable expectation of privacy re his Facebook page' – no control over how comments may be copied/passed on