Belfast Health and Social Care Trust
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Reference No: TP 76/11

Title	**Social Media Policy**		
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Ownership	Bronagh Dalzell, Head of Communications, Corporate Communications		
Approval by	WGPR Subcommittee Trust Policy Committee Executive Team Meeting	**Approval date**	16 May 2019 1 August 2019 7 August 2019
Operational date	August 2019	**Next review**	August 2024
Version No.	3	**Supercedes**	V2 – January 2015 – January 2018
Key words	Social media, Facebook, Twitter, Instagram, WhatsApp, You Tube, Messenger, Personal, Professional, Safeguarding		
Links to other policies	This document should be read in association with relevant policies, guidelines and legislation. This includes, but may not be limited to, the following policy documents: • **ICT security policy**, which provides a framework for security of all information and communication technologies throughout the Trust, including email and the internet. • **Policy on data protection and protection of personal information,** which outlines our legal obligation to protect information relating to others. • **Conflict, bullying and harassment in the workplace policy and procedure**, which sets out our commitment to prevent bullying and harassment at work. • **Working well together policy**, which deals with issues of bullying. • **Equal opportunities policy,** which outlines our commitment to prevent unlawful discrimination		

Date	Version	Author	Comments
01/10/2018	0.1	S McKenna	Initial draft
11/01/2019	0.2	S McKenna	Second draft incorporating changes agreed from equality check
10/04/2019	0.3	S McKenna	Third draft incorporating feedback from HR Senior Management Team

16/05/2019	0.3	S McKenna	Policy approved by WGPR Sub-Committee
05/07/2019	0.3	S McKenna	Equality screening approved
16/07/2019	FINAL	S McKenna	Final version issued to be presented at Trust Policy Committee

Contents

1.0 INTRODUCTION / PURPOSE OF POLICY

1.1 Background

'Social media' or 'social networking' are the terms commonly used to describe websites and online tools/platforms that allow users to interact with each other by messaging and sharing information, opinions, knowledge and interests. This is a rapidly progressive area and this policy will be updated as our communication strategies evolve.

Social media provides many opportunities to improve the way we target, communicate and interact with the different communities we serve. Belfast Trust uses these platforms for open and transparent engagement with stakeholders and service users.

However, when using these technologies there are a number of risks and issues to consider, both for individual employees and the organisation. These risks need to be identified and managed to ensure the benefits can be realised in as safe a manner as possible.

Outside the workplace, social networking sites are used by many people to keep in touch with friends and colleagues. Every day, people talk online about Belfast Trust and all employees are naturally part of this conversation. Each individual therefore has the potential to be an ambassador for the Trust, regardless of what part of the organisation they work in.

In the vast majority of cases, staff use of platforms such as Facebook, Twitter, Instagram and WhatsApp is trouble-free. However, guidance is provided to ensure staff act in a positive way and avoid actions that may negatively affect the reputation of the Trust or leave themselves open to allegation.

The guidance within this policy applies to all social media channels, not just those specified here.

1.2 Purpose

This policy relates to both the professional and personal use of social networking sites by employees of the Trust. The policy's purpose is to:

- help protect the organisation and your personal interests
- advise you of the potential consequences of your behaviour and any content you may post online

1.3 Objectives

This policy aims to:

- provide guidance to staff on their personal responsibility as an employee of the Trust when using any social networking site
- help staff get the best out of the tools available while maintaining a safe professional environment and protecting themselves and the organisation's reputation
- ensure staff are aware of all relevant legislation and standards relating to online information, including codes of practice from related professional bodies
- provide managers and individual employees with information to consider before participating in or developing any new social media application

1.4 Compliance with related policies and legislation

This document should be read in association with relevant policies, guidelines and legislation. This includes, but may not be limited to, the following policy documents:

- **ICT security policy**, which provides a framework for security of all Information and Communication technologies in use throughout the Trust, including use of email and the internet.
- **Policy on data protection and protection of personal information,** which outlines our legal obligation to protect information relating to others.
- **HR policies on harassment and working well together,** which deal with issues of harassment and bullying.

1.5 Codes of practice

Professional bodies may have issued their own code of practice relating to the use of social media. Staff have a personal responsibility to be aware of codes of practice relating to their professional body. However, the Trust policy remains the definitive guidance for staff in the use of social media as an employee of Belfast Trust.

2.0 SCOPE OF THE POLICY

This policy applies to all staff directly employed by Belfast Trust and for whom the Trust has legal responsibility. 'Staff' relates to everyone on a Trust contract, including temporary, bank, student and honorary contracts. The policy also applies to those people working for Belfast Trust and carrying out Trust duties while employed by a recruitment agency or similar third party.

Social media is the term commonly given to online platforms and tools that allow users to interact with each other in some way – by sharing information,

photos, videos, opinions, knowledge and interests. As the name implies, social media involve the building of online communities or networks to encourage participation and engagement.

Examples of social media include social network sites (for example Facebook, Twitter, LinkedIn, Instagram, Snapchat, Reddit, Pinterest), blogs, messenger tools (for example WhatsApp, Facebook Messenger, Telegram), video/image hosting sites (for example You Tube, Vimeo, Instagram, Flickr, Imgur) and many other similar online channels.

This policy applies to the use of social media for both Trust and personal purposes, during office hours or otherwise. The policy also applies whether social media are accessed using Belfast Trust devices and the Trust network, or devices belonging to members of staff and other networks.

3.0 ROLES / RESPONSIBILITIES

All Belfast Trust staff and third party employees working for the Trust are responsible for the success of this policy and should ensure they take time to read and understand it. Any misuse of social media should be reported to your line manager.

It is the responsibility of the line manager to investigate any reported breaches of this policy, in conjunction with HR, ICT and Corporate Communications. Where necessary, it is also the responsibility of line managers, through the Trust's Data Protection Office, to report breaches of Data Protection to the Information Commissioner's Office (ICO).

Questions regarding the content or application of this policy should be directed to: Paul Harron, Senior Communications Manager: Paul.Harron@belfasttrust.hscni.net

4.0 KEY POLICY PRINCIPLES

Any Belfast Trust staff member or person working for the Trust is free to participate on social media. Trust staff are the organisation's best ambassadors and many already use social media in a personal and professional capacity. This policy aims to support the responsible use of social media, not restrict it.

Staff and others working for Belfast Trust should use discretion and common sense when communicating online. Many people now use one account (for

example a personal Twitter account) to post a combination of personal and professional content. This means they often identify themselves as a Trust employee or representative on their account, which leaves them open to scrutiny and criticism.

However, Trust staff or people working for the Trust who do not identify themselves as an employee or representative, or who use separate personal and professional social media accounts, are still expected to uphold the standards within this policy.

4.1 Personal use of social media

Your personal image on social media should reflect our Trust Value of 'Treating everyone with respect and dignity'.

Inappropriate comments about the Trust, our patients, clients or colleagues can bring the Trust into disrepute and leave both the Trust and employee open to legal action. Improper use of social media can also damage an employee's professional reputation.

The following policy statements refer to all types of content on social media and are designed to protect the Trust and the employee from risk of allegation, disrepute and liability.

Staff **should never** do any of the following:

4.1.1 post, share or react to (eg. 'like') confidential information online

4.1.2 post, share or react to inappropriate or derogatory comments about a staff member, patient or client – this includes any conversations about patients or complaints about colleagues

4.1.3 post, share, react to or link to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content

4.1.4 use social media sites to bully or intimidate a member of staff (any member of staff who feels they have been harassed or bullied, or is offended by material posted by a colleague on social media, should inform their line manager or the HR Department)

4.1.5 use social media in any way that is unlawful

4.1.6 accept friend requests from patients, clients or their family members who you only know through your professional work (you should immediately remove any that apply from your 'friends' list)

4.1.7 imply they are speaking for the Trust when posting in a personal capacity

4.1.8 publish your Trust email address on a personal social media account

4.1.9 use your Trust email address as part of your registration/login details for a personal social media account

4.1.10 let social media use interfere with your job, whether you are accessing platforms through the Trust network or on a personal device

4.2 Professional use of social media

Your relationship with social media changes when you identify yourself as a Belfast Trust employee, speak in any kind of professional capacity or use social media for Trust business.

Social media engagement with Trust colleagues, professionals, partners and the public is encouraged and very important. It helps promote our work and messages, supports the work of other organisations and provides service users with useful information.

This engagement comes with responsibilities and standards of behaviour should be adhered to. You are publicly representing the Trust and should participate in the same way you would in a public meeting or forum. Remember your comments online will be permanently available to others and open to scrutiny.

You should also be aware that you may attract media interest in yourself or the organisation, so proceed with care. If you have any doubts, take advice from your line manager, who may in turn contact the Trust media office in Corporate Communications.

If you see something on social media that needs a corporate media response, please share it with our Trust media office – Tel: (028) 9063 6464; Email: mediaservices@belfasttrust.hscni.net

Professional use of social media is defined as:

- posting about, sharing, discussing or reacting to work-related issues on third party social networks, professional forums or discussion boards
- creating and/or managing content on a social media site created, branded and managed by the Trust
- social media monitoring for business purposes

When communicating on social media in a professional capacity, staff **must:**

4.2.1 seek approval from your line manager before participating, or declare any existing interests

4.2.2 clearly identify yourself as an employee of Belfast Trust and state your role

4.2.3 write in the first person and make it clear you are speaking for yourself and not on behalf of Belfast Trust

4.2.4 respect copyright, fair use, data protection, defamation, libel, equality, human rights, and financial disclosure laws

4.2.5 be professional – make sure you are always honest, accurate, fair and responsible

4.2.6 get written permission to publish any information, report or conversation that is not already in the public domain – do not cite or reference colleagues, partners or suppliers without their written approval

When communicating on social media in a professional capacity, staff **must not:**

4.2.7 reveal confidential information about patients, staff or the organisation

4.2.8 post or share any information that can be used to reveal a patient's identity or health condition in any way

4.2.9 use abusive, racist, sectarian, homophobic, sexist or otherwise offensive or discriminatory language

4.2.10 post or share information that is disparaging to the HSC, patients or other members of staff

4.2.11 use social media to 'whistle blow' without having already raised concerns through the proper channels

4.2.12 endorse or appear to endorse any commercial product or service

4.2.13 use the Belfast Trust logo as your account image

4.2.14 voice opinion on specific political representatives or parties

4.3 Creating social media accounts

It is important for the Trust to maintain a coherent online presence through the strategic use of official communication channels. Therefore, without having developed a business case and gained approval from the Digital Communications Team and relevant Director, you **must not** set up:

- Belfast Trust Twitter accounts
- Belfast Trust Facebook pages
- Belfast Trust Instagram accounts
- Belfast Trust YouTube / Vimeo channels
- a presence on any other social media site that seeks to represent the official views of Belfast Trust
- unauthorised blogs on behalf of Belfast Trust services or individuals
- surveys using any unapproved online channels

The business case to get such an online presence approved should outline how this activity will benefit the service area or programme and compare the benefits to the time and resources required.

The Digital Communications Team can provide advice on things you will need to consider, such as:

- time and resources required
- more effective alternatives (for example a Facebook Group instead of a Facebook page)
- editorial policy

- evaluation process and timeframes
- risks and issues

New social media accounts **must:**

4.3.1 have clearly defined objectives and key performance indicators (KPIs)

4.3.2 have a content plan, editorial purpose and be used to communicate with stakeholders regularly

4.3.3 be based on clear evidence of user needs and their use of that channel

4.3.4 be sufficiently resourced to allow accounts to be checked multiple times a day with responses to questions/comments provided as appropriate

4.3.5 not be used for promoting internal initiatives (staff communications)

Please note that accounts **may be closed** for the following reasons:

4.3.6 **inactivity** – for example, no original posts for one month or more

4.3.7 **infrequency** – for example, less than one tweet/post a week over a two month period

4.3.8 **lack of interest** – for example, the account has been active for six months or more but has fewer than 100 followers

4.3.9 **lack of relevance** – the programme or project has closed

4.3.10 **failure to adhere to this social media policy**

4.4 Video and media file sharing

Video is great for providing stimulating and engaging content, which can be shared on social media sites and embedded on other people's websites. To reach the widest audience, it is important that, where possible, public video content is placed on the Belfast Trust YouTube and/or Vimeo channels. You **must not** post video content on a non-approved online channel. Some social media videos may not be suitable for You Tube or Vimeo.

You must ensure that all video and media (including presentations) are appropriate to share/publish and do not contain any confidential, commercially sensitive or defamatory information.

Official Belfast Trust content should be branded and tagged appropriately, and should not be credited to an individual or production company.

Videos should also meet accessibility guidelines and be useable by all, regardless of disability. Captions should always be added where possible.

4.5 Safeguarding children, young people and adults at risk

Social media/networking sites introduce a range of potential safeguarding risks to these groups. Most children, young people and adults use the internet positively, but sometimes they and others may behave in ways that pose a risk. Potential risks can include, but are not limited to:

- online bullying
- grooming, exploitation or stalking
- giving away personal details
- exposure to inappropriate material or hateful language
- encouragement to engage in illegal acts, violent behaviour, self-harm or risk-taking
- people's wellbeing being damaged

Follow these steps to safeguard children, young people and adults at risk:

4.5.1 do not target or engage with children who are likely to be under the minimum requirement age for the social media platform you are using or promoting (this is usually 13 years old, but can vary by platform)

4.5.2 do not accept 'friend' requests from anyone you suspect to be underage

4.5.3 avoid collecting personal details and do not ask users to provide any, including:

- home and email addresses
- school information
- home or mobile numbers

4.5.4 you should not use any information in an attempt to locate and/or meet a child, young person or vulnerable adult unless it is work-related

4.5.5 be careful how you use images of children, young people or adults – consider using models, stock photography or illustrations

4.5.6 if a child, young person or adult at risk is named, do not use their image

4.5.7 if an image of a child, young person or adult at risk is used, do not name them

4.5.8 where necessary, get parents'/carers'/guardians' or Lasting Power of Attorney's written consent to film or use photographs on websites

4.6 Safeguarding yourself

If you are using corporate or personal social media/networking accounts for work-related activity, you should also:

4.6.1 ensure your privacy settings are set up so that personal information you many not want to share is not available to the public

4.6.2 have a neutral picture of yourself as your profile image

4.6.3 avoid using your work contact details (email or telephone) as part of your personal profile or personal contact details as part of a work profile

4.6.4 avoid engaging in intimate or sexual conversations

4.6.5 ensure any personal pictures you upload are not intimate, compromising or sexually explicit

4.6.6 inform the Digital Communications Team and your line manager if any social media or online interaction threatens to get antagonistic or upsetting (you should also disengage from such an interaction)

4.7 Reporting safeguarding concerns

4.7.1 Belfast Trust has a statutory responsibility to safeguard the welfare of children, young people and adults at risk. We all have the responsibility to report any concerns about their welfare.

4.7.2 You can report any concerns about the welfare of a child, young person or adult at risk to the Gateway service on:

- 028 9050 7000 (children and young people)
- 028 9504 1744 (adults)

Outside normal working hours, you can report concerns to the Regional Emergency Social Work Service on 028 9504 9999.

4.7.3 Any online concerns should be reported as soon as possible because law enforcement and safeguarding agencies may need to take urgent steps to support the person.

4.7.4 Where a child, young person or adult is in immediate danger, dial 999 for PSNI assistance.

4.7.5 If you have concerns about a breach in the terms of service for a particular platform, for example participation of underage children or adults at risk, nudity in images, use of unsuitable language, grooming, stalking or ideas posted that could lead to terrorist activity, you should report this to the service provider. You should also report this activity to your Service Manager, Co-Director and the Digital Communications Team.

4.7.6 For personal safeguarding, you should report any harassment or abuse you receive online **while using corporate or personal accounts for Belfast Trust-related business** to the Digital Communications Team and your line or senior manager. They will advise you on what further action should be taken and refer the issue to the Trust legal and HR teams as required

4.8 References and endorsements

The following rules apply on sites such as LinkedIn where personal and professional references are the focus:

4.8.1 If you are representing yourself as a Belfast Trust employee, you may not provide professional references about any current or former employee, agency worker, contractor or vendor.

4.8.2 You may provide a personal reference or recommendation for current or former Belfast Trust employees, agency workers, contractors or vendors in the following instances:

- the statements made and information provided in the reference are factually accurate and
- you include this disclaimer: 'This reference is provided by me in a personal capacity. It is not a reference from Belfast Trust'

5.0 IMPLEMENTATION OF POLICY

5.1 Dissemination

This policy is relevant to all staff and should be widely distributed throughout each directorate. Electronic copies will be available on the Social media information section of the Hub.

5.2 Resources

In addition to this policy document, the following staff awareness materials are available to download:

- Posters
- Guidelines on social media content
- Information video

These resources are all available on the Social media information section of the Hub.

Social media training for staff is also available through the Information Governance mandatory training programme, which includes the following modules:

- Be Data Wise & Data Secure
- My Data Your Business

5.3 Exceptions

No exceptions.

6.0 MONITORING

The Trust regularly monitors social media as part of our overall media strategy. Staff should remember they are ultimately responsible for what they publish online and may face disciplinary action if this policy is breached.

If you are considering publishing something that makes you uncomfortable, consult this policy. If you are in doubt or need further guidance, please contact the Digital Communications Team: DigitalComms@belfasttrust.hscni.net

Staff are also reminded that actions online can be in breach of Trust harassment/IT/equality policies and any online breaches of these policies may also be treated as conduct issues.

7.0 EVIDENCE BASE / REFERENCES

- **ICT security policy**, which provides a framework for security of all information and communication technologies throughout the Trust, including email and the internet.
- General Data Protection Regulation (GDPR) and the Data Protection Act 2018, and the Trust **policy on data protection and protection of personal information,** which outlines our legal obligation to protect information relating to others.
- The Trust **policy on working well together**, which deals with issues of harassment and bullying.
- Information Commissioners Office website: ico.org.uk/

8.0 CONSULTATION PROCESS

The draft policy was issued to wider HR, Information Governance and Equality teams, as well as trade union representatives, for comment.

The draft version was also issued to directors for circulation throughout service areas.

9.0 APPENDICES / ATTACHMENTS

Appendix 1: Quick guide to using social media
Appendix 2: Social media guidance poster
Appendix 3: Guidelines on social media content

10.0 EQUALITY STATEMENT

The Trust has legal responsibilities in terms of equality (Section 75 of the Northern Ireland Act 1998), disability discrimination and human rights to undertake a screening exercise to ascertain if this policy/proposal has potential impact and if it should be subject to a full impact assessment. This process is the responsibility of the policy or service lead – the template and guidance are available on the Belfast Trust Intranet. Colleagues in Equality and Planning can provide assistance or support.

The outcome of the Equality screening for this policy is:

Major impact ☐

Minor impact ☒

No impact ☐

11.0 DATA PROTECTION IMPACT ASSESSMENT

New activities that involve collecting and using personal data can result in privacy risks. In line with requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, the Trust has to consider the impacts on the privacy of individuals and ways to mitigate against the risks. Where relevant, an initial screening exercise should be carried out to ascertain if this policy should be subject to a full impact assessment (see Appendix 7). The guidance for conducting a Data Protection Impact Assessment (DPIA) can be found via this **link**.

The outcome of the DPIA screening for this policy is:

Not necessary – no personal data involved ☐

A full data protection impact assessment is required ☐

A full data protection impact assessment is not required ☒

If a full impact assessment is required, the author (Project Manager or lead person) should go ahead and begin the process. Colleagues in the Information Governance Team will provide assistance where necessary.

12.0 RURAL IMPACT ASSESSMENTS

From June 2018, the Trust has a legal responsibility to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans, and when designing and delivering public services. It is your responsibility as policy or service lead to consider the impact of your proposal on people in rural areas – you will need to refer to the shortened rural needs assessment template and summary guidance on the Belfast Trust Intranet. Each Directorate/Division has a Rural Needs Champion who can provide support/assistance in this regard if necessary.

13.0 REASONABLE ADJUSTMENTS ASSESSMENT

Under the Disability Discrimination Act 1995 (as amended), the Trust has a duty to make reasonable adjustments to ensure any barriers disabled

people face in gaining and remaining in employment and in accessing and using goods and services are removed or reduced. It is therefore recommended the policy explicitly references "reasonable adjustments will be considered for people who are disabled – whether as service users, visitors or employees".

SIGNATORIES

7 August 2019

_____ **Date:** _____

Bronagh Dalzell
Head of Communications

7 August 2019

_____ **Date:** _____

Martin Dillon
Chief Executive