### Social Media Policy

**POLICY / PROCEDURE / GUIDELINE**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **START DATE:** | | June 2024 | | **EXPIRY DATE** | | | | June 2026 |
| **COMMITTEE**  **APPROVAL:** | | **NAME OF COMMITTEE:**    INSERT | | | | **NAME OF CHAIR OF**  **APPROVING COMMITTEE** | | |
| **DATE APPROVED:**    INSERT | | | |
| **OR NAME OF CHAIR OR EXEC DIRECTOR (for minor amendments):**    **Emer Delaney, Director of Communications**  **DATE:** | | | | | | |
| **DISTRIBUTION** | | Trust-wide | | | | | | |
| **RELATED**  **DOCUMENTS/**  **OTHER**  **INFORMATION:** | | Use of Social Media Policy (HR)  Social Media Policy (Comms)  Information Security Policy  Acceptable Use Policy  Acceptable Behaviour Policy  CCTV and Body Worn Cameras Policy  Data Protection and Confidentiality Policy  Information and Data Quality Policy  Disciplinary and Appeals Policy and Procedure  Information Governance Policy  Records Management Policy and Procedures  Risk Management Policy  Safe Haven Policy | | | | | | |
| **AUTHOR:**  **NAME & JOB**  **TITLE** | | Lilley Bridges, Senior Communications Officer | | | | | | |
| **STAKEHOLDERS INVOLVED:** | |  | | | | | | |
| **IS AN EQUALITY ANALYIS REQUIRED?** | | | | | | | NO | |
| **IF AN EQUALITY ANALYIS IS REQUIRED, HAS IT BEEN SENT TO THE EQUALITY AND DIVERSITY MANAGER?** | | | | | | | YES / NO | |
| **DOCUMENT REVIEW HISTORY:** | | | | | | | | |
| **Date** | **Version** | | **Responsibility** | | **Comments** | | | |
| 05/09/2028 | Draft v1 | | Manager Desktop Build | | Creation of supporting policy for revised Information Security Policy | | | |
| 10/03/2020 | V1 | | Manager Desktop Build | | Publication and page renumbering | | | |
| 14/02/2022 | V1.1 | | Digital Operation Manager | | Review, update and removal of references to Sphere services. | | | |
| 06/02/2024 | V1.1 | | Digital Operation Manager | | Review and re-submit for approval | | | |
| 12/06/2024 | V2 | | Director of Communications | | Review, update and re-submit for approval. | | | |

CONTENTS

1. **Introduction**
   1. The purpose of this Social Media Policy is to provide guidance in line with HMG and private sector best practice to ensure that the applicable and relevant security controls are set in place for accessing Social Media from a Trust device/location.
   2. This policy is to ensure that security of information and data held by Chelsea and Westminster NHS Foundation Trust (the Trust) is the concern of all staff, patients, contractors and third party agencies, as well as other members of the public.
   3. This policy is a supporting policy of the Trust’s Information Security Policy, Acceptable Use Policy and the NCSC’s objective of “Protecting against cyber-attacks”.
   4. Individuals must be mindful that social media is like any other form of communication and should be treated as such. Something that would be deemed inappropriate to say by letter or face-to-face would also be inappropriate to say on social media.
   5. The policy explains why and how the Trust uses social media, including how staff can use social media in a professional capacity as well as rules and guidance for staff on using social media in a personal capacity.
   6. It will show how Trust staff can seek further guidance or escalate an issue relating to social media.
   7. Social media platforms can provide effective means to spread news and information about the Trust in an accessible format, enhancing Trust’s ability to engage with and receive feedback from audiences that might otherwise be difficult to reach.
   8. Social media use can therefore be used as a tool to improve hospital services and enhance the patient experience. It can show followers and outside world updates from within the Trust as well as allow staff to see recognition of their work.
   9. Social media can also bring risks to the Trust and staff;
   10. By publishing via social media platforms, we are putting information into the public domain and in effect making a public statement. As such, comments that are perceived to come “from” the Trust or from individuals identifying themselves as Chelsea and Westminster Hospital NHS Foundation Trust staff via social media should be treated in the same way as any comments made publicly in the media by an official spokesperson.
   11. Communication between individual members of staff and patients/families via social media has the potential to compromise professional patient-staff boundaries and patient confidentiality
   12. The Trust (and specifically the Communications and Hospital Digital teams) will take practical measures to ensure that chelwest.comms@nhs.net is the first point of contact for all social media enquiries and requests from hospital staff.
   13. This policy ensures the communications team operate and also monitor the Trust’s main social media accounts. The Trust is represented on X (formerly known as Twitter, Facebook, Instagram, and LinkedIn).
2. **Definitions**

|  |  |
| --- | --- |
| Social Media | Social media are considered to be IT based technologies (desktop, laptop, tablet and smartphone) that allow the creating and sharing of information, ideas, career interests and other forms of expression via virtual communities and networks.  Social media may include, **but is not limited to**:  • Social networking sites such as Facebook, Google+, LinkedIn and an extreme example would be GAB.com. This is a far right-wing platform, which disseminates offensive content  • Blogging sites such as X (Twitter), a micro-blogging site  • Video, photo sharing websites or ‘vlogs’ such as Flickr, Instagram, OnlyFans, TikTok, YouTube, Vimeo and Vine  • Forums, discussion boards and groups (for example Google Groups, Yahoo Answers, Mumsnet)  • Any webpage that allows users to comment beneath an article (e.g. news websites like guardian.com or dailymail.co.uk)  • Wikis (websites that are created collaboratively by users, e.g. Wikipedia)  • Social bookmarking sites, such as Reddit or Digg |
| Blogging or Tweeting (micro-blogging): | For the purposes of this policy, ‘blogging’ refers to the use of a public website to post content online (known as a ‘blog’) or sharing thoughts and opinions on various subjects. ‘Tweeting’ refers to posts made on the public micro-blogging platform X (Twitter). Blogs and Tweets are usually maintained by an individual with regular entries of commentary, descriptions of events, and may include other material such as graphics or video. Many blogs and tweets are interactive allowing visitors to respond leaving comments or sending messages to others. |

1. **Scope**
   1. This policy covers the acceptable use of social media when accessed through Trust or NHS Information systems or on any other systems storing, processing and transmitting NHS and other UK Government information in support of NHS or health and social care business functions.
   2. This policy applies to the following staff groups:

* All CWFT employed staff - where the individual is directly employed by CWFT either on a fixed term or permanent contract;
* Board Members – Member of the Trust Board. Specifically, the Chair, Non-Executive Directors and Executive Directors
* Governors – Member of the Council of Governors
* Contractors – individuals on-site at CWFT, who are employed by an external contracting company including consultancy work;
* Agency staff – individuals on-site at CWFT who are employed via an agency on the NHS Agency Framework;
* Honorary contract holder – individuals engaged via a CWFT Honorary contract;
* Bank staff – individuals with a CWFT bank contract;
* Volunteers - individuals employed via the CWFT volunteer programme.
* Students - students on placement within the Trust as part of their educational programme
* Foundation Year 1 & Foundation Year 2 Placements – those training to be doctors at Foundation Year 1 and 2 level, who wish to experience a Paediatric Hospital environment to help inform future career decisions

1. **Aims and Objectives**
   1. Ensure that staff are aware of the correct procedures for sharing Trust information via social media, and the wider guidelines for use of social media.
   2. Enable staff to use social media effectively and appropriately, in line with the organisation’s social media policy.
   3. Minimise risk where social media is used by teams, departments or by individual members of staff.
   4. Build awareness among all staff about their responsibilities in ensuring that social media queries and requests must be shared with [chelwest.comms@nhs.net](mailto:chelwest.comms@nhs.net) in the first instance to ensure all social media activity is handled responsibly.
   5. Prioritise full consideration of patients, families and staff when sharing content via the Trust’s social media channels, including ensuring that content is appropriate and no patient is interviewed, photographed, filmed or identified without written consent from their parent, guardian or carer.
2. **Duties and Responsibilities** 
   1. **The Trust**
      1. The Trust must provide robust procedures for individual staff, teams and the organisation as a whole in managing and handling social media activity that is in any way linked to the hospital.
   2. **Director of Communications**
      1. Has overall responsibility for ensuring all Trust social media activity is handled effectively and responsibly
   3. **The Communications Team**
      1. Specifically, the Trust’s Communications team manages the social media for the Trust.
      2. Advising on, and implementing, social media policy and strategy
      3. Planning and publishing content to social media channels
      4. Monitoring third party posts relating to the Trust
      5. Supporting hospital staff regarding social media requests and concerns
      6. If staff have any queries relating to social media, including requests to start up new accounts or any concerns about social media activity relating to or affecting the Trust, its staff or patients, they must email [chelwest.comms@nhs.net](mailto:chelwest.comms@nhs.net)
   4. **IMT & Information Governance Team**
      1. The IM&T and Information Governance (IG) departments are charged with ensuring compliance with this policy.
3. **Why the Trust uses social media**
   1. Social media can be used as a tool to help promote and explain what the Trust does. It can provide an immediate source of sharing messaging and content than traditional forms of communication, and so can be a very effective means of engaging with patients, families and other stakeholders.
   2. As with positive media coverage, effective engagement on social media enhances the Trust’s reputation, bringing many benefits to the Trust in terms of attracting patients, specialist staff, trainees and funding.
   3. Social media can allow people to see what the Trust is sharing remotely, ensuring activity is more accessible
4. **How the Trust and Charity use Social Media**
   1. Chelsea and Westminster Hospital and West Middlesex Hospital have a joint presence on the main social media platforms: Instagram, LinkedIn and TikTok. They have separate presences on X (formerly Twitter) and Facebook.
   2. The aims of the presences are to:
      1. Help support patients and families at the Trust
      2. Help support staff at the Trust
      3. Disseminate practical information to staff, patients and families
      4. Support staff retention and recruitment
      5. Engage with digital audiences about the work of the Trust
      6. Generate support from public and healthcare partners when the Trust enters a crisis
      7. The Trust is also aware of other social media presences promoting particular aspects of the Trust’s work. All staff must gain approval from the Trust before launching any new CWFT-related social media account or page, by emailing [chelwest.comms@nhs.net](mailto:chelwest.comms@nhs.net) to discuss their proposal.
5. **Accessing social media**

8.1 Only social media sites that have been authorised and enabled by Trust IT for users that have been authorised and enabled shall be accessed via the Trust’s IT systems, including via CWHFT issued smartphones

8.2 Accessing social media for personal use on the Trust’s IT systems shall not be allowed

8.3 Where a Trust role is authorised to use social media for their responsibilities (e.g. use of Twitter, Facebook and Vimeo use by Communications staff) this shall be in accordance with the role requirements and as outlined in the job description

1. **Sharing content on CWFT’s social media channels**
   1. The Communications teams operate and monitor the CWFT social media presences outlined in section 5
   2. These accounts reach an audience of patients, families, NHS trusts, academic and scientific institutions and other stakeholders, including charity supporters and fundraisers, corporate partners and journalists.
   3. If staff would like to share content about hospital projects from any of these accounts, they must email [chelwest.comms@nhs.net](mailto:chelwest.comms@nhs.net).
   4. All social media accounts professionally linked to the Trust (e.g. departmental X (Twitter) or Instagram accounts, the main GOSH accounts) must have passwords and access processes that are compliant with the Trust’s Information Security Policy.
2. **Individuals using social media in a professional capacity** 
   1. There is no requirement for staff to use social media in a professional capacity, unless it is specifically part of their role.
   2. However, social media can be increasingly useful to staff in a number of ways. For instance, staff might use social media to support their work by joining a linkedIn group that relates to an area of professional interest
   3. Staff may also wish to support the Trust on social media by following and sharing content from organisations social media channels
   4. When using social media in a professional capacity, staff members must conduct themselves as they would in any professional situation. They must be mindful that they could be seen to represent CWFT and that the opinions they express could have implications for the wider organisation.
   5. Staff must consider the implications of identifying themselves to patients and families online, who might then try to connect with or message them, and the difficulties this could pose in terms of maintaining professional boundaries
   6. Similarly, staff members must protect patient confidentiality online as they would at any other time. No patient information can be posted on social media unless appropriate and with express individual or parental consent and the prior agreement of the Communications team. This includes information visible in any photographs posted.
   7. As such, staff must be familiar with and adhere to these policies (all available on the hospital intranet):

* Use of Social Media Policy (HR)
* Social Media Policy (Comms)
* Information Security Policy
* Acceptable Use Policy
* Acceptable Behaviour Policy
* CCTV and Body Worn Cameras Policy
* Data Protection and Confidentiality Policy
* Information and Data Quality Policy
* Disciplinary and Appeals Policy and Procedure
* Information Governance Policy
* Records Management Policy and Procedures
* Risk Management Policy
* Safe Haven Policy
  1. If staff become aware of any families or patients using social media in a way that breaches other patients’ and families’ confidentiality, for example posting ward-based photos that identify other patients, they must inform [chelwest.comms@nhs.net](mailto:chelwest.comms@nhs.net) immediately and record on Datix.
  2. Remember that what is written can be viewed by anyone and it may not be possible to delete it. Even with enhanced privacy settings, social networks are open platforms and content can be stored permanently or recorded by others by a photograph/screenshot. Staff must not post anything they would not be happy to say publicly. If staff are concerned about anything they have posted in the past, which may interfere with their role at CWFT or CWFT more widely, they should speak with the Communications team.
  3. Staff must never mislead about their identity or expertise, or claim to be someone they are not.
  4. If staff are developing mobile apps to run on devices such as smartphones and tablet computers, they must inform [chelwest.comms@nhs.net](mailto:chelwest.comms@nhs.net)
  5. Staff should be aware that any social media activity, either in personal or professional capacities, that brings or could bring CWFT into disrepute or affects or could undermine confidence in the care that CWFT provides will be dealt with under the Trust’s Disciplinary Policy#

1. **Setting up new corporate CFTW social media accounts**
   1. The policy of the Trust is to keep official CWFT presences, representing both the hospital and charity, on each of the main social media platforms to a minimum.
   2. The Trust takes this approach to ensure:

• branding and messaging are consistent

• risk is minimised

• it’s easy for patients, their families, other stakeholders and supporters to find CWFT on social media

• it does not dilute our impact; by focusing our digital footprint we can create and maintain an engaged audience

• there is sufficient resource to monitor and manage our collective channels

* 1. If staff, teams, departments, committees or other groups wish to set up any other corporate CWFT social media accounts, they must email [chelwest.comms@nhs.net](mailto:chelwest.comms@nhs.net) in the first instance before proceeding. The Communications Teams must approve any new social media presence.
  2. There is no restriction on new accounts nor is there an open approval for all. Proposals will be assessed on a case-by-case basis by the Communications Team
  3. Building and maintaining an engaged online audience requires effort and enthusiasm over a long period. Staff should consider the resource implications of any project of this type before making a proposal, including the objectives of the new presence, the scope and type of content that will be published, how regular content will be supplied and shared, and how robust and regular monitoring of the page will be put in place
  4. The Communications and Hospital Digital Teams are always happy to consider new content ideas for our existing sites and social media channels. Please email [chelwest.comms@nhs.net](mailto:chelwest.comms@nhs.net)

**12. Personal use of social media by staff**

12.1 Staff must be conscious of how their personal use of social media may affect their professional standing and impact on the organisation.

12.2 General rules and guidance:

12.2.1 Even in their personal use of social media, individuals should assume that they could be identified as a CWFT employee even if they do not label themselves as such on their profile. Individuals must consider whether the comments or activities they are posting online are appropriate as a representative of the Trust.

12.2.2 Individuals must also assume that anything they post online could be read by anyone, including colleagues, patients and their families and stakeholders. This is the case even if the post is then deleted, as content can be stored permanently or recorded by others by a photograph/screenshot.

12.2.3 Staff members are forbidden from publishing images or text that might be considered as harassment or are discriminatory, offensive or abusive. This includes the promotion of discrimination based on factors such as race, sex, religion, nationality, disability, sexual orientation or age

12.2.4 If individuals wish to publish an external blog post or an online article that mentions CWFT, they should speak first to the Communications team by emailing [chelwest.comms@nhs.net](mailto:chelwest.comms@nhs.net). As well as providing guidance and signing off the content, they may be able to help promote it.

12.2.5 There may be circumstances where it is important for CWFT to maintain a neutral public stance in relation to an issue to ensure confidence in Trust services. Accordingly, CWFT may ask certain staff to not make any social media posts in connection with or related to those services and related matters and/or may impose restrictions in relation to any such posts.

12.2.6