



**Lindsey Lodge Hospice**

**SOCIAL MEDIA POLICY**

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## **1 Introduction**

Lindsey Lodge Hospice recognises that the Internet provides a unique opportunity to participate in interactive discussions and share information using a wide variety of social media, such as Facebook, Twitter, and blogs. Employees are likely to use social media in a private capacity outside of work and they may also be required to use it in a business capacity as part of their role.

The social media ethos is all about engagement, participation and relationship building. Every platform encourages its users to take part by commenting on what they see and getting involved in conversations with others. This makes it a particularly useful vehicle both for informing service users/patients and for gaining their feedback.

However, employees' use of social media in both a personal and business capacity can present risks to our confidential information and reputation, and can jeopardise our compliance with legal obligations. To minimise these risks, and to ensure that our IT resources and communications systems are used appropriately, we expect employees to adhere to this policy.

The purpose of this policy is to assist employees by providing clear guidance about acceptable behaviour on social media both at work and outside of work.

## **2 Scope**

This policy applies to all staff working for or on behalf of Lindsey Lodge Hospice, including permanent staff, bank staff and volunteers.

All staff are expected to comply with this policy at all times to protect the privacy, confidentiality, and interests of the organisation and our services, employees, partners, customers and service users/patients.

This policy applies to the use of social media for both business and personal purposes, whether during working hours or otherwise. It also applies whether the social media is accessed using work IT facilities, or equipment belonging to members of staff.

## **3 Definitions**

Social media is a type of interactive online media that allows parties to communicate instantly with each other, or to share data in a public forum. This includes online social forums such as Twitter, Facebook, Linked-In, internet newsgroups, and chat rooms. Social media also covers blogs and video and image-sharing websites such as YouTube and Instagram.

Lindsey Lodge recognises that social media offers us many opportunities to communicate both internally and externally and is a valuable tool to impact positively on our reputation and to publicise important issues.

There are many more examples of social media than can be listed here and this is a constantly changing area. This policy refers to the examples listed, and any new social media which is developed in the future.

Where reference is made to commenting or posting on social media sites, these are made interchangeably, and include all forms of communication including written, audio, video and images.

#### **4 Roles and Responsibilities**

##### **a. Marketing & PR Co-coordinator**

- Take overall ownership of the organisation's social media activity
- Maintain a register of all Lindsey Lodge Hospice approved social media sites and pages which promote the services of the organisation and has direct responsibility for the content and management of them
  - They will ensure that all content posted or published via the site on behalf of the organisation is compliant with this policy
  - They will also maintain the security of login information to ensure that non-compliant posts are not made in the name of the organisation
  - Monitor and report/remove any comments that are a cause for concern

Nobody apart from the Marketing & PR Co-coordinator must set up a social media account on behalf of Lindsey Lodge. This is the sole responsibility of the person named above.

##### **b. Information Governance Lead**

The IG Lead will advise on security and privacy related matters concerning the safe use Social Media. The IT Support offers fulfils this role.

##### **c. Line Managers/Team Leaders**

Line managers have a responsibility to:

- Take prompt action to stop any harassment or bullying they become aware of, whether a complaint has been raised or not
- Ensure staff are aware of the Social Media Policy and employee guidelines and adhere to them
- Take appropriate action where there is a breach of the Social Media Policy
- Support employees who are the subject of abuse through existing practices
- Ensure all complaints/allegations are dealt with fairly and consistently, and in accordance with other employment policies where appropriate

##### **d. All Staff**

Employees have a responsibility to:

- Adhere to the Social Media Policy
- Ensure personal activity on social media doesn't conflict or compromise their professional role at Lindsey Lodge Hospice
- Avoid behaviour that may cause an individual to feel they are the subject of harassment or bullying
- Familiarise themselves with the Social Media Policy and employee guidelines for using social media in the Appendix and ensure adherence
- Act responsibly when using online media for work and personal use
- Report instances to their manager, if they are subject to abuse

## 5 Key Principles

### Personal accountability and responsibility

All employees are expected to behave appropriately and responsibly, and should be aware that they may be accountable to the organisation for actions outside of their work.

Online conduct is the employee's responsibility, and it is important that employees are aware that posting information on social networking sites in a personal capacity cannot be entirely isolated from their working life.

Any information published online can be accessed around the world within seconds and will be publicly available for all to see, and is not easy to delete/withdraw once published.

Lindsey Lodge Hospice views any comment that is made on a social media site is made publicly, and that any inappropriate comment made, will be considered in the context of which it is made. For example, disparaging comments against a colleague made to all friends on Facebook could be viewed as bullying/harassment, or could be considered to bring the organisation into disrepute.

Employees are advised to be mindful that all comments made through social media must meet the standards of existing Lindsey Lodge policies including:

- Confidentiality and Data Protection Policy
- Code of Conduct
- Equality and Diversity policy
- Bullying and Harassment Policy

Employees will be accountable for their actions outside work, including making comments or posting any photographs, pictures etc. on social media sites, if that is contrary to any of Lindsey Lodge policies; impacts on or compromises the employee's ability to undertake their role; undermines management decisions; impacts negatively on Lindsey Lodge's reputation. Such behaviour could be investigated and may result in disciplinary action being taken, and ultimately could result in dismissal.

Further employee guidance is available in the Appendix to this policy.

### Access to social media for work purposes

Lindsey Lodge has a presence on 2 main social media platforms:

Twitter:

[www.twitter.com/lindseylodgehospice](http://www.twitter.com/lindseylodgehospice)

Facebook:

[www.facebook.com/@lindseylodgehospice](http://www.facebook.com/@lindseylodgehospice)

Staff who use social media as part of their job must adhere to the organisation's guidelines around the use of corporate social media accounts. Employees must be aware that they are representing Lindsey Lodge Hospice when they are contributing to the

organisation's social media activities. Employees should use the same safeguards as they would with any other form of communication about the organisation in the public domain.

Staff should maintain a separation between their personal account and any work based activities they may undertake.

### **Access to social media at work for personal use**

Access to social media sites for personal use is permitted providing staff adhere to the following:

- Access takes place at appropriate, approved break times e.g. lunch break
- Access complies to the guidelines set out in this policy and the Lindsey Lodge Hospice Internet Policy
- Usage is not excessive

Inappropriate use of social media may result in access from work being withdrawn and may lead to action being taken in accordance with the Lindsey Lodge Discipline Procedure.

Please refer to the Lindsey Lodge Hospice Internet Policy for further details on which sites and behaviours are deemed inappropriate.

All internet usage at work, including social media may be subject to monitoring. Please refer to the Lindsey Lodge Hospice Internet Policy for more information.

### **Inappropriate use of social media**

The use of social media for the following types of activities is specifically prohibited.

- Bringing the organisation into disrepute e.g.
  - Criticising service users/patients, colleagues or Lindsey Lodge Hospice
  - Making defamatory comments about individuals or other organisations/groups
  - Posting images that are inappropriate or links to inappropriate content
- Breaching confidentiality e.g.
  - Referring to confidential information about an employee, service user/patient or the organisation
  - Posting information that may lead to the identification of a service user/patient without their consent
- Bullying, harassment or discriminatory behaviour towards any group or individual, in contravention of Lindsey Lodge Hospice policies e.g.
  - Making offensive or derogatory comments relating to sex, gender-reassignment, race (including nationality), disability, sexual orientation, religion or belief, marriage and civil partnership, pregnancy and maternity or age;
  - Using social media to bully another individual
  - Posting images that are discriminatory or offensive or links to such content.
- Activities which impact on the employee's ability to do their job e.g.

- Online activity that is incompatible with the position they hold in the organisation
- Any breach occurring inside or outside the workplace that is likely to affect the employee doing his/her work
- Building or pursuing inappropriate relationships with service users/patients outside of official Lindsey Lodge Hospice communication channels

The above examples are not a definitive list of the misuse of social media, but are examples to illustrate what misuse may look like. Employees are encouraged to talk to their manager and seek advice if they are unclear. You may also be able to find specific guidance for your profession from your professional body, for example the NMC provides guidance for nurses and midwives.

### **Medical advice and information**

Some service users/patients may attempt to receive medical advice via social networking sites, particularly if it is a NHS-related site. All staff should refrain from engaging in social media discussions about an individual's medical status in order to protect their medical confidentiality as all comments and discussion will be in the public domain.

Staff must not engage in personal or private exchanges of messages through social networking sites to give medical advice with service users/patients. If approached for medical advice online, signpost the individual to the correct service or the Single Point of Access (SPA) for advice or assessment.

### **Addressing allegations of misuse**

All employees are required to adhere to this policy. Comments made through social media may constitute an act of misconduct or gross misconduct, which could lead to dismissal, if the comments contravene any of the organisation's policies or if they lead to a breakdown in the relationship of mutual trust and confidence.

Managers should ensure that all complaints are dealt with consistently and fairly in line with this policy and HR guidance.

## **6 Associated Policies**

- Information Security Policy
- Information Governance Policy
- Confidentiality and Data Protection Policy
- Disciplinary Procedure
- Equality and Diversity policy

## Appendix 1

### Employee guidance on the use of social media

- Employees must be mindful that any online activities/comments made in a public domain, must be compatible with their position within Lindsey Lodge Hospice, and safeguard themselves in a professional capacity. Please refer to 7.2 for links to the social media guidelines of various professional bodies
- Protect your own privacy. To ensure that your social network account does not compromise your professional position, ensure that your privacy settings are set correctly
- Comments made outside work, within the arena of social media, do not remain private and so can have an effect on or have work-related implications. Therefore, comments made through social media, which you may intend to be “private” may still be in contravention of the Employee Code of Conduct, the Harassment and Bullying Policy and/or the Disciplinary Policy. Once something is online, it can be copied and redistributed making it easy to lose control of. Presume everything you post online will be permanent and can be shared
- Do not discuss work-related issues online, including conversations about service users/patients, complaints, management or disparaging remarks about colleagues or Lindsey Lodge Hospice. Even when anonymised, these are likely to be inappropriate. In addition doing this in the presence of others may be deemed as bullying and/or harassment
- Do not under any circumstances accept friend requests from a person you believe could be a service user/patient or may conflict with your employment
- Be aware that other users may access your profile and if they find the information and/or images it contains offensive, make a complaint about you to Lindsey Lodge Hospice as your employer
- Ensure that any comments and/or images cannot be deemed defamatory, libellous or in breach of copyright legislation or confidentiality
- When setting up your profile online consider whether it is appropriate and prudent for you to include a photograph, or provide occupation, employer or work location details. Refer to your professional body for advice
- You can take action if you find yourself the target of complaints or abuse on social networking sites. Most sites will include mechanisms to report abusive activity and provide support for users who are subject to abuse by others
- If you do find inappropriate references and/or images of you posted by a ‘friend’ online you should contact them and the site to have the material removed
- If you are very concerned about someone else's behaviour online, you should take steps to raise your concerns. If these are work related you should inform your manager

- Privacy settings - even with privacy settings locked down, this guidance still applies. Screenshots can be taken and posts shared
- Be aware journalists now have alerts set up on social media key words, if you say something on a public page you can be quoted in print without your permission
- As a general rule you should not post any information or messages on the internet that you would be unwilling to say in public
- If you feel even slightly uneasy about something you are about to publish, then you shouldn't do it
- Be aware when posting photos not to breach confidentiality (e.g. service users/patients or confidential information in the background)
- When posting about a subject area that may relate to your professional role, always make it clear that your views and opinions may not represent the views of Lindsey Lodge Hospice.

## 7 Useful Links (correct at time of publication)

Links to various regulators and professional bodies' social media guidelines:

<http://www.nhsemployers.org/your-workforce/need-to-know/social-media-and-the-nhs/social-media-guidelines>

Nursing and Midwifery Council social media guidance

<https://www.nmc.org.uk/globalassets/sitedocuments/nmc-publications/social-media-guidance.pdf>

NHS Employers Facebook privacy settings guide

<http://www.nhsemployers.org/-/media/Employers/Documents/Social/NHS%20get%20social%20presentations%20Nov%2016/NHSE%20Facebook%20Flyer%20v3.pdf>

Various social media publications for the NHS

<http://www.nhsemployers.org/your-workforce/need-to-know/social-media-and-the-nhs/social-media-publications>

Facebook privacy help pages

<https://www.facebook.com/help/325807937506242/>

Twitter privacy help pages

<https://support.twitter.com/articles/14016>

## 8 Consultation

IT & IG committee

## 9 Dissemination

Via Lindsey Lodge `L` drive policies/guidelines of this form.

## 10 Equality Act

In accordance with the Equality Act (2010), the Hospice will make reasonable adjustments in the workplace so that an employee with a disability, as covered under the Act, should not be at any substantial disadvantage. The Hospice will endeavour to develop an environment within which individuals feel able to disclose any disability or concern which may have a long term ad substantial effect on their ability to carry out their normal day to dayactivities.

The Hospice will wherever practical make adjustments as deemed reasonable in light of an employee's specific circumstances and the Hospice's available resources paying particular attention to the Disability Discrimination requirements and the Equality Act (2010)

REFERENCES: Care Plus IT Group (LLH IT provider)					
Lead Author of Policy: Kay Fowler, IT Support Officer Responsible Sub-group IT & IG committee					
RATIFICATION DATE BY TRUSTEES 19 <sup>th</sup> October 2017 Review interval 3 year					
TO REVIEWED	BE	REVIEW COMPLETED	BY	APPROVED BY	CIRCULATION
Oct 2020					