Social Media Policy

VERSION CONTROL

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VERSION HISTORY

Date	Version	Comment / Update
August 21	1.0	Drafted by Raman Johal, Communications and Involvement Manager/Lucy Barratt, Social Media Executive, Healthcare Partnership
August 21	1.1	Reviewed by Communications Team/HR Team
October 21	1.2	Reviewed by ICB Governance Team
October 21	1.3	Reviewed by ICB Staff Forum
17 November 21	1.4	Approved by Governing Body

CONTENTS:

1.0   INTRODUCTION

Social media is the term commonly used to describe websites and online tools which allow people to interact online with each other. In this way people share information, opinions, knowledge, and interest.

Coventry and Warwickshire Integrated Care Board (ICB) is now making increased use of these sites and tools, to engage with their service users, and other stakeholders, and to deliver key messages concerning good healthcare and services to the public. These online digital interactions are encouraged by ICB, and their use is likely to grow as service needs change and new social media channels become available.

Social networking is also used by many individuals in a personal capacity. All members of staff need to be aware that, in all circumstances, including when they are acting in a personal capacity in their private lives, they need to have regard to the principles and guidance outlined in this policy. This applies even where staff are using the highest level of privacy settings available to them.

ICB recognises that in recent years there has been a significant rise in the use of social networking sites. It is recognised that all staff are entitled to privacy in their personal life. ICB is committed to always maintaining the confidentiality and safety of service users and other staff whilst also maintaining the reputation of the ICB by supporting staff to exhibit acceptable behaviour.

If a member of staff has concerns about the online conduct of any other staff or of a member of the public, including those known to them, this should be raised with an appropriate manager.

2.0   PURPOSE

The purpose of this policy is to ensure the ICB's social media activity is safe, appropriate, purposeful, and legal, and outline Personal and Professional Use of social media.

It also aims to:

- Minimise the reputational, legal and governance risks to the ICB and its employees arising from the use of social media by staff in a professional or personal capacity.
- Enable all members of staff to understand their responsibilities when using social media.
- Ensure a consistent approach is applied across the ICB.
- Personal use of social media is defined as that which staff use for their own purposes. This includes any activity undertaken by staff in in a personal capacity. All staff need to ensure they always use social media carefully and appropriately, as their actions could damage the reputation of ICB.
- Professional use of social media is defined as that which staff use for the purposes of the ICB. This includes staff use whereby their role directly pertains to management of the ICB social media accounts
- Staff whose role does not involve management of the ICB social media accounts may wish to use social media in a professional capacity or only use social media as a result of their role within the ICB. In such instances, requests for new corporate social media accounts or closed groups that directly reference ICB should be emailed to the Communications team via ICB.communications@nhs.net. This encourages the user to consider the business case,

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the resource implications, the choice of channel(s) and how the activity will align with business objectives and form part of your wider communications and marketing strategy.

3.0   DEFINITIONS

In this policy, the terms **social media** and **social networking** are used interchangeably. Social media is defined as interactive online technology tools that allow individuals to exchange and share information and resources, including pictures, instantly via the internet. This includes online blogs, personal websites, discussion boards, email groups, instant messaging and forums such as Facebook, Twitter and LinkedIn. The term social media also covers blogs and video sharing sites including YouTube and TikTok. This list is not intended to be exhaustive as this is a constantly evolving area. Staff should follow this policy in relation to any social media that they use.

As the name implies, social networking involves the building of online communities and networks encouraging participation and engagement.

4.0   SCOPE

The policy applies to NHS Coventry and Warwickshire ICB and all its employees and must be followed by all those who work for the organisation including those on temporary or honorary contracts, secondments, agency staff, work experience staff and volunteers.
This document is not a social media strategy, or guidance on how to use individual social media tools and platforms. Help and guidance on the use of social media can be provided by the communications team.

5.0   RESPONSIBILITIES

5.1   Manager Responsibilities

- Ensure that employees are familiar with the Social Media Policy and their obligations in relation to the management of this policy.
- To inform/consult the Director of Corporate Affairs and HR Business Partner for any instances reported to them/identified in which behaviour has not been acceptable/has been identified. The Manager and Director of Corporate Affairs will investigate or review any concerns accordingly.

5.2   Employee Responsibilities

- Ensure that they are complying with the expectations of this policy and that they conduct themselves online in the same manner that would be expected of them in any other situation, to uphold the reputation of the ICB and, where relevant, the reputation of their profession.
- To advise their manager of any personal social media posts in relation to the ICB which have unintentionally become inflammatory/negative
- When using social media for personal or professional use, ensure that they:

- Do not make reference to or post images/videos about ICB services, staff or service users without permission from the individual or communications team
- Do not breach confidentiality or publish content that constitutes an information risk, including personal and sensitive information. This may result in an information security breach which may be escalated.

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- Do not discuss business sensitive information.
- Do not write or report on conversations, meetings or matters that are meant to be private, commercially sensitive or internal to the ICB.
- Do not comment on work related issues.
- Do not do anything that could be considered discriminatory, bullying or harassment of any individual, for example by making offensive or derogatory comments relating to protected characteristics under the Equality Act 2010.
- Do not make inappropriate comments about the ICB, its services, staff/colleagues or service users.
- Staff using social media for personal use who wish to make reference to or upload pictures/videos about or including colleagues should seek their permission before doing so. If permission is not given the content should not be published.
- If you are asked by the ICB to remove social media content about the ICB which is deemed not appropriate about another colleague at a later date this should be done immediately.
- Staff using social media must conduct themselves in a professional manner and in a way in which they do not bring the ICB and its work into disrepute or breach their professional boundaries.

- If staff using social media for personal use choose to associate themselves with the ICB i.e. employed by Coventry & Warwickshire Integrated Care Board / ICB, staff must ensure that they act in a manner which does not bring the ICB or their profession into disrepute.
- Staff wishing to obtain further advice should contact their line manager and/or the ICB's communication and engagement team
- Staff should be aware where any concerns and/or issues arise, or are identified, regarding the inappropriate use of social media this may ultimately lead to disciplinary action.

6.0 BREACHES OF THE POLICY

If guidelines in this policy appear to have been breached, the matter should be reported and investigated in accordance with ICB policies and procedures for managing disciplinary offences. Complaints about the use of social networking sites or other online activity will be taken as seriously as any other breaches by the ICB. Consideration should be given to:

- any professional boundaries that have been crossed
- any breach of confidentiality
- whether an association with the ICB has been identified
- whether any of the material is offensive to colleagues or service users or potentially damaging to the reputation of anyone to whom the staff member owes a duty of care as an employee of the ICB

Social media content may be requested under the Freedom of Information Act 2000. Where the requested content exists and does not breach Data Protection principles, this content must be disclosed to the requestor. In such circumstances, this content will usually relate to ICB service provision. Please refer to the ICB's Freedom of Information Policy.

7.0 GENERAL GUIDELINES FOR THOSE USING SOCIAL MEDIA FOR PROFESSIONAL USE

Any requests for social media accounts in a professional capacity representing the ICB should be made to the communications team.

Acceptable behaviour on social media includes specific channel behaviours such as abbreviations, hashtags and sharing other user's content. So while there are some principles of best practice outlined here, account managers should also use tools to enhance your message, build your service reputation in your chosen channel and create engagement. You should also follow the adopted etiquette techniques for your chosen platforms, which are likely to be continuously evolving.

One of the key reasons to have a ICB social media account is to add value for people across Coventry and Warwickshire. By adding value, we can help people to find the information they need quicker, empower people to help themselves, build trust between communities and the ICB and efficiently answer service-related questions. The following best practice guidelines are based on this principle.

- Social media is a conversation between the ICB and one or more members of the public. Show that you are listening by acknowledging both compliments and criticisms. The tone of voice used should be friendly, conversational and engaging. We should be polite, open and respectful as well as being honest and helpful. We must never judge, assume or guess.
- Be clear, credible and consistent – be accurate, avoid jargon, abbreviations and slang, but respond in a reasonably concise way. If the answer to a question is long or complex, try to move the conversation onto email or a direct message. Acknowledge both compliments and constructive criticism and ensure your responses are consistent with the ICB's other communications.
- Be responsive – respond to questions, ideally in a timely way. Offer insights where appropriate, share links to further resources and connect with other accounts or individuals if they are better placed to help. If you don't know the answer to a question, find out who does. Never be afraid to say, "I don't know, let me find out for you", especially if finding the answer is likely to cause a delay in response.
- Optimise content – better content leads to higher engagement. Make use of images, video, GIFs and emojis where appropriate and ensure your content is appropriate to each particular platform. Appropriate use of hashtags is also useful to attract new audiences to your account and to show that your content is part of a wider campaign or awareness day.
- Publish a range of posts, not just ones that advertise your services. These could include job vacancies, news, reposts from related accounts, blog posts and good health related news stories in the area.
- Personalise the messages. The ICB is not just an organisation, it is a group of people and social media is an appropriate place to show this. If it's appropriate, personalise your messages with your first name or initials. It helps to build that feeling of personal conversation as well as accountability.
- Include useful links, especially if you want your audience to do something as a result of your post (for example, click here, read more, please share).

7.1   Accessibility best practice

As social media administrators, it is our responsibility to ensure that our content is accessible and inclusive. Given that 15% of the world's population experiences some sort of disability, this is the only way we can ensure that we connect with our full potential audience. Keeping social media

accessible means recognising exclusion, learning from our followers and presenting information in the clearest way possible.

The following will help to keep your social media account inclusive.

- Make text accessible to all, including those using screen readers, those learning English as a second language or those with learning disabilities.
- Write in plain language, don't overuse capitals or acronyms that people most likely will not be familiar with.
- Put hashtags and mentions at the end, so they don't interrupt content from screen readers.
- When using hashtags, ensure that each word uses a capital letter so that they are read in the correct way by screen readers. For example, #CovWarks (not #covwarks).
- Replace 'click here' with more descriptive call-to-actions like 'sign up', 'try it for free' or 'subscribe'.
- Use an adequate font size, especially over images.
- Avoid special characters.
- Limit line length.
- Use inclusive language such as gender-neutral pronouns and terms and evaluate text for assumptions of limited points of view.
- Use descriptive captions and alternative text (known as alt text), which allow people to visualize images when they can't see them. Facebook, Twitter, Instagram and LinkedIn provide specific fields for you to add alt-text for images and GIFs, but where this isn't possible, include descriptive captions instead.
- Include video captions, which are crucial for viewers with hearing impairments. They also enhance the viewing experience for people watching in their non-native language, or viewers in sound-off environments. Video adverts that include captions on Facebook see a 12% average increase in view time.
- Add video descriptions, which share the important sights and sounds that are not spoken. This can be done either through descriptive audio, descriptive transcript or live described video.
- Don't rely on colour to convey meaning - at least 2.2billion people globally have some form of vision impairment including colour blindness. Use symbols or patterns as an alternative or addition; better still, add clarifying labels.
- Promote positive inclusion by using content that is representative of your audiences (for example, gender, race, disability) and featuring diversity through your visuals, partnerships and collaborations. Also be aware of role assignment and portrayal and ensure that any image is not promoting racist, sexist, ageist, homophobic or other stereotypes.

7.2   Crisis communications best practice

There will be times when your service or account may be involved in a crisis. These can take many forms and levels, but we would normally classify a social media crisis if:

- the subject is the only thing people are talking about negatively,
- the subject is highly emotive or represents a high reputational risk,
- the subject is legal in nature – or has negative legal connotations,
- the wider media have picked up on it and are reporting it negatively.

If you think your account is in crisis, then post a listening message (something as simple as 'Thank you for bringing this to our attention, we are investigating and will respond as soon as we

are able'). This gives you time to assess the situation, make sure relevant stakeholders are aware, and discuss the most appropriate response with Communications.

Your considered response should be agreed by all stakeholders before posting on social media. In formulating this, there are several things to consider.

- What format will the response take? A tweet, a post, a statement, a news release?
- Does it answer the questions asked?
- Is the information in the public domain?
- Does it show empathy?
- If we are sorry, have we said sorry?
- Are we being sufficiently transparent?
- Have we updated other communication channels (for example, website) so that there is a consistent message?
- Does the response use plain English and avoid council jargon?
- Would it help to have published FAQs to sit alongside the response?

Once the response is made, return to listening and share any new information with stakeholders.

8.0   EQUALITY STATEMENT

In applying this policy, the ICB will have due regard for the need to eliminate unlawful discrimination, promote equality of opportunity, and provide for good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation, in addition to offending background, trade union membership, or any other personal characteristic.

As part of the ICB's equal opportunities monitoring, all disciplinary hearings are monitored in a rolling annual basis. Subsequently information may be held on the disciplinary monitoring register longer than the duration of the warning itself.

9.   MONITORING

The policy and procedure will be reviewed periodically by the Communications and Engagement Team on behalf of the ICB Governing Body. Where review is necessary due to legislative change, this will happen immediately.

This Policy should be read in conjunction with the following documents:

- Data Protection Act 2018
- Human Rights Act 1998
- DoH Confidentiality Code of Practice
- ICB Internet Use Policy
- ICB Standard of Business Conduct Policy
- ICB Dignity at Work Policy
- ICB Disciplinary Policy
- ICB Information Governance Policy
- ICB Whistleblowing Policy
- Equality Act (2010)

Equality Impact Assessment

Project / Policy Details

What is the aim of the project / policy?
To ensure that the employees and their line managers are aware of their responsibilities in in relation to ICB social media activity so that it is safe, appropriate, purposeful, and legal.

Who will be affected by this work? e.g staff, patients, service users, partner organisations etc.
The policy applies to NHS Coventry and Warwickshire ICB and all its employees and must be followed by all those who work for the organisation including those on temporary or honorary contracts, secondments, agency staff, work experience staff and volunteers.

Is a full Equality Analysis Required for this project?			
Yes	Proceed to complete this form.	No	Explain why further equality analysis is not required.
If no, explain below why further equality analysis is not required. For example, the decision concerned may not have been made by the ICB or it is very clear that it will not have any impact on patients or staff.			

Equality Analysis Form

1. Evidence used
What evidence have you identified and considered? This can include national research, surveys, reports, NICE guidelines, focus groups, pilot activity evaluations, clinical experts or working groups, JSNA or other equality analyses.

- Data Protection Act 2018
- Human Rights Act 1998
- DoH Confidentiality Code of Practice
- ICB Internet Use Policy
- ICB Standard of Business Conduct Policy
- ICB Dignity at Work Policy
- ICB Disciplinary Policy
- ICB Information Governance Policy
- Equality Act 2010

2. Impact and Evidence:
In the following boxes detail the findings and impact identified (positive or negative) within the research detailed above; this should also include any identified health inequalities which exist in relation to this work.

Age: A person belonging to a particular age (e.g. 32 year olds) or a range of ages (e.g. 18-30 year olds)

This policy has no negative impact on this protected characteristic. The policy is to help prevent any social media activities that could be considered discriminatory, bullying or harassment of any individual, for example by making offensive or derogatory comments relating to protected characteristics under the Equality Act 2010. Promotion of information, events is provided to members of the public, not just via social media.

Disability: A person has a disability if he/she has a physical, hearing, visual or mental impairment, which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities

This policy has no negative impact on this protected characteristic. The policy is to help prevent any social media activities that could be considered discriminatory, bullying or harassment of any individual, for example by making offensive or derogatory comments relating to protected characteristics under the Equality Act 2010. The policy provides details of how the ICB seeks to keeps social media accessible and inclusive, recognising exclusion, learning from its followers and presenting information in the clearest way possible.

Gender reassignment (including transgender): Where a person has proposed, started or completed a process to change his or her sex.

This policy has no negative impact on this protected characteristic. The policy is to help prevent any social media activities that could be considered discriminatory, bullying or harassment of any individual, for example by making offensive or derogatory comments

relating to protected characteristics under the Equality Act 2010.

Marriage and civil partnership: A person who is married or in a civil partnership.	
This policy has no negative impact on this protected characteristic. The policy is to help prevent any social media activities that could be considered discriminatory, bullying or harassment of any individual, for example by making offensive or derogatory comments relating to protected characteristics under the Equality Act 2010.	
Pregnancy and maternity: A woman is protected against discrimination on the grounds of pregnancy and maternity. With regard to employment, the woman is protected during the period of her pregnancy and any statutory maternity leave to which she is entitled. Also, it is unlawful to discriminate against women breastfeeding in a public place.	
This policy has no negative impact on this protected characteristic. The policy is to help prevent any social media activities that could be considered discriminatory, bullying or harassment of any individual, for example by making offensive or derogatory comments relating to protected characteristics under the Equality Act 2010.	
Race: A group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.	
This policy has no negative impact on this protected characteristic. The policy is to help prevent any social media activities that could be considered discriminatory, bullying or harassment of any individual, for example by making offensive or derogatory comments relating to protected characteristics under the Equality Act 2010.	
Religion or belief: A group of people defined by their religious and philosophical beliefs including lack of belief (e.g. atheism). Generally a belief should affect an individual's life choices or the way in which they live.	
This policy has no negative impact on this protected characteristic. The policy is to help prevent any social media activities that could be considered discriminatory, bullying or harassment of any individual, for example by making offensive or derogatory comments relating to protected characteristics under the Equality Act 2010.	
Sex: A man or a woman	
This policy has no negative impact on this protected characteristic. The policy is to help prevent any social media activities that could be considered discriminatory, bullying or harassment of any individual, for example by making offensive or derogatory comments relating to protected characteristics under the Equality Act 2010.	
Sexual orientation: Whether a person feels generally attracted to people of the same gender, people of a different gender, or to more than one gender (whether someone is heterosexual, lesbian, gay or bisexual).	
This policy has no negative impact on this protected characteristic. The policy is to help prevent any social media activities that could be considered discriminatory, bullying or harassment of any individual, for example by making offensive or derogatory comments relating to protected characteristics under the Equality Act 2010.	

Carers: A person who cares, unpaid, for a friend or family member who due to illness, disability, a mental health problem or an addiction cannot cope without their support
This policy has no negative impact on this protected characteristic. The policy is to help prevent any social media activities that could be considered discriminatory, bullying or harassment of any individual, for example by making offensive or derogatory comments relating to protected characteristics under the Equality Act 2010.

Other disadvantaged groups:
This policy has no negative impact on other disadvantaged group. The policy is to help prevent any social media activities that could be considered discriminatory, bullying or harassment of any individual, for example by making offensive or derogatory comments relating to protected characteristics under the Equality Act 2010.

3. Human Rights		
FREDA Principles / Human Rights	**Question**	**Response**
Fairness – Fair and equal access to services	How will this respect a person's entitlement to access this service?	The specific purpose of this policy is to help prevent any social media activities which are considered unfair or unequal
Respect – right to have private and family life respected	How will the person's right to respect for private and family life, confidentiality and consent be upheld?	The specific purpose of this policy is to help prevent any social media activities which are considered unrespectful to a person's right for private, family life and confidentiality. The policy confirms due process will be followed if confidentiality/consent is breached.
Equality – right not to be discriminated against based on your protected characteristics	How will this process ensure that people are not discriminated against and have their needs met and identified?	The specific purpose of this policy is to help prevent any social media activities which are considered discriminatory

Dignity – the right not to be treated in a degrading way	How will you ensure that individuals are not being treated in an inhuman or degrading way?	The specific purpose of this policy is to help prevent any social media activities which are considered to treat individuals with dignity in mind.
Autonomy – right to respect for private & family life; being able to make informed decisions and choices	How will individuals have the opportunity to be involved in discussions and decisions about their own healthcare?	The specific purpose of this policy is to help prevent any social media activities which are considered not to be autonomous
Right to **Life**	Will or could it affect someone's right to life? How?	n/a
Right to **Liberty**	Will or could someone be deprived of their liberty? How?	n/a

4. Engagement, Involvement and Consultation		
If relevant, please state what engagement activity has been undertaken and the date and with which protected groups:		
Engagement Activity	**Protected Characteristic/ Group/ Community**	**Date**
N/A		

For each engagement activity, please state the key feedback and how this will shape policy / service decisions (E.g. patient told us …. So we will …..):

5. Mitigations and Changes

Please give an outline of what you are going to do, based on the gaps, challenges and opportunities you have identified in the summary of analysis section. This might include action(s) to mitigate against any actual or potential adverse impacts, reduce health inequalities, or promote social value. Identify the **recommendations** and any **changes** to the proposal arising from the equality analysis.

n/a

6. How will you measure how the proposal impacts health inequalities?

e.g Patients with a learning disability were accessing cancer screening in substantially lower numbers than other patients. By revising the pathway the ICB is able to show increased take up from this group, this is a positive impact on health inequalities.

You can also detail how and when the service will be monitored and what key equality performance indicators or reporting requirements will be included within the contract.

The policy provides details of how the ICB seeks to keeps social media accessible and inclusive, recognising exclusion, learning from its followers and presenting information in the clearest way possible.

7. Is further work required to complete this assessment?			
Please state what work is required and to what section. e.g additional consultation or engagement is required to fully understand the impact on a particular protected group (e.g disability).			
Work needed	**Section**	**When**	**Dare completed**
None required			

8. Sign off		
The Equality Analysis will need to go through a process of **quality assurance** by a Senior Manager within the department responsible for the service concerned before being submitted to the Policy, Procedure and Strategy Assurance Group for approval. Committee approval of the policy / project can only be sought once approval has been received from the Policy, Procedure and Strategy Assurance Group.		
Requirement	**Name**	**Date**
Senior Manager Signoff		
Which committee will be considering the findings and signing off the EA?		
Approved by the Policy Procedure and Strategy Assurance Group.		