

Comms

SOCIAL MEDIA POLICY

Policy Number:	Comms-001
Version:	4.0
Purpose:	The purpose of this policy is to set out the standards of behaviour expected of all those who claim an association with the Trust when using social media.
Consultation:	• Director of Organisational Development • Director of Corporate Governance & Trust Secretary • Assistant Director, HR • JNCF
Approved by:	Chief Executive Officer
Date approved:	March 2025
Author:	Kate Nelmes, Head of Communications
Date issued:	April 2025
Review date:	April 2027
Executive Lead:	Chief Executive Officer
Audience:	Trust employees, Board members, Governors, volunteers and contractors
Dissemination:	Trust intranet
Impact assessments:	This policy has been equality impact assessed using the Trust's agreed process, and the assessment has not identified any significant adverse impact on people with one or more protected characteristic.

VERSION HISTORY

Version	Date	Reason for Change
1	1 Oct 2019	Updated policy for GHC
2	July 2023	Review and update
3	December 2023	Review and update
4	March 2025	Review and update on use of X/Twitter

THIS IS A CONTROLLED DOCUMENT

Whilst this document may be printed, the electronic version maintained on the Trust intranet is the controlled copy. Any printed copies of this document are not controlled. It is the responsibility of every individual to ensure that they are working to the most current version of this document.

CONTENTS TABLE

	<u>Page No.</u>
PART 1 Summary	3
PART 2	4
1.0 Introduction	4
2.0 Purpose	4
3.0 Scope	4
4.0 Duties	5
5.0 Document Detail	6-9
PART 3 Explanatory Information	10
6.0 Definitions	10
7.0 Process	10
8.0 Training	10
9.0 Associated Documents	11

PART 1

SUMMARY

Gloucestershire Health and Care NHS Foundation Trust recognises that many individuals who have an association with the Trust engage in social networking and the use of social media.

Social media is widely used because it enhances communication and brings groups and individuals with common interests together in a virtual way. The Trust actively encourages social media use and provides its own social media channels, including Facebook, Twitter (also known as X), YouTube, Instagram and LinkedIn. Our staff are encouraged to engage with our social media channels, and share our content appropriately with their networks in order to more widely share our news, job vacancies and promote access to services.

There are many benefits to social media but there are also pitfalls. Where an individual identifies their association with the Trust or their role in the work of the Trust, it is important to ensure that all personal social media activity is consistent with the Trust's values and policies and to all relevant standards of behaviour and professional codes of conduct which may apply.

PART 2

1.0 INTRODUCTION

- 1.1 This policy sets out the standards of behaviour expected of all those whom claim or portray an association with the Trust or the NHS when using social media.

2.0 PURPOSE

- 2.1 The purpose of this policy is to set out the standards of behaviour expected of all those who claim an association with the Trust or the NHS when using social media. The policy is not meant to deter people from using social media but to help protect social media users and prevent them from bringing the NHS and/or the Trust into disrepute either inadvertently or intentionally. The policy also specifies the potential consequences of any action which contravenes these principles.
- 2.2 For the purposes of this policy, 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, but is not limited to: chat; online blogs; personal websites; discussion, comment and message forums; email groups; instant messaging; social networking sites, and file sharing sites, including video. This list is not intended to be exhaustive as this is a constantly evolving area. Social media users should follow this policy in relation to any social media that they use.
- 2.3 This policy does not prevent or seek to prevent anyone from raising legitimate concerns about patient or public safety. However, where this is the intention of the communication, the Trust's Whistleblowing Policy, should be used.

3.0 SCOPE

- 3.1 This policy applies to all persons carrying out an activity at the request of or through agreement with the Trust, whether this is business, employment or another activity, and regardless of whether the activity is paid or unpaid. This includes Non-Executive Directors, Governors, employees, (including those on fixed term contracts, or 'Bank' staff), Experts by Experience, contractors and volunteers. For the purpose of this policy the term "social media users" will be used to describe those above.
- 3.2 The scope of the policy includes use of both Trust resources and personal resources to access social media sites. The policy also applies to the use of social media outside of working hours. Employees, in particular, are expected to maintain a professional approach to work, patients and colleagues at all times. Other people to whom this policy applies should be mindful of their behaviour and responsibilities at all times when using social media.
- 3.3 All existing and related organisational policies apply when using social media within the scope of this policy e.g. IT Acceptable Use Policy, Disciplinary Policy,

Grievance Policy, Whistleblowing Policy, the Data Protection Act and relevant professional codes of conduct for healthcare professionals.

- 3.4 This policy applies whether an individual is originating content, forwarding or resharing content, or replying to earlier content.
- 3.5 Social media is the term commonly used for websites and other electronic media which allow people to interact with each other in some way by sharing information, opinions, knowledge and [ledge://restartinterest](#). Also known as social networking, it involves the building of online communities and networks encouraging participation and engagement.
- 3.6 The Trust recognises that in recent years there has been a significant rise in the use of social media, and recognises the benefits that the use of such media can bring to everyone. The Trust supports the responsible use of social media by all social media users, alongside safeguards to ensure the confidentiality and safety of service users, employees and Trust business.

4.0 DUTIES

4.1 Head of Communications

The Head of Communications is responsible for the relevance, accuracy, content and proper release of this policy.

4.2 Managers

Managers are responsible for ensuring this policy is adhered to within their own area, taking appropriate action when required, and ensuring that those within their area of responsibility, including volunteers, are made aware of the policy and their responsibilities.

4.3 Employees

All employees are responsible for complying with this policy and any associated guidance that may be produced. Employees, including managers, are responsible for ensuring that any communication on social media that comes to their attention and contravenes this policy is brought to the attention of their manager, the Head of Communications or a member of the Human Resources Department.

If an employee is concerned about another employee's online behaviour then they should report this to their line manager along with any supporting evidence, so that any appropriate action can be considered in accordance with Trust policy.

If employees believe that information has been inadvertently posted, they may wish to bring this to the attention of the individual who has posted the information.

4.4 Volunteers

Although not employed by the Trust, Volunteers are expected to abide by the Trust's requirements and standards of behaviours whilst carrying out voluntary duties on behalf of the Trust.

4.5 Training Manager

As part of Trust induction training for all Trust employees, the Training Manager has a responsibility for ensuring that this policy is cascaded as appropriate at the start of employment.

4.6 Human Resources

Human Resources will be responsible for providing advice as to the application of this policy when set against other Trust policies and for any employee contractual requirements

4.7 All Others

Other people as described in the scope of this policy are responsible for complying with this policy and any associated guidance that may be produced.

5.0 DOCUMENT DETAIL

5.1 THE VALUE OF SOCIAL MEDIA

5.1.1 Social media forms an integral part of the lives of many people. Staff, service users, carers, volunteers and others may rely on various forms of social media to keep in touch, maintain their health and wellbeing, social relationships, professional development and career development. The Trust welcomes the use of social media for all these purposes and wishes to engage with social media users on several levels:

- To tackle stigma and promote mental health advice and support
- To promote physical health advice and support
- To promote Learning Disability advice and support
- To aid recruitment
- To support learning and development opportunities
- To maximise the quality of contact with service users and carers
- Provide a range of information to those who have contact with the Trust and its services 24 hours a day, making information available when the recipient needs it
- Improve efficiencies and effectiveness of working time, reducing unnecessary travel

5.1.2 To maximise the use of social media and its beneficial impact on staff and our services, the Trust welcomes feedback on how its use could be improved. Comments can be posted via the Trust's Facebook site, Twitter account etc.

However, the Trust is also clear that the use of social media can be fraught with unintended consequences and open to misuse by those who deliberately wish to do so. The Trust therefore wishes to support staff who are social media users by providing clear guidance on "Do's", "Don'ts", expectations and Trust

values to safeguard and enhance everyone's experience of using or accessing social media. Many of these may seem to be common sense, however, it is often easy to lose sight of the wider ramifications of "posts" when interacting with like-minded social media users.

5.2 POLICY PRINCIPLES

5.2.1 Individuals should make sure that when using social media to talk about the Trust, colleagues, and in general, they do so by using sound judgement, and common sense. Every communication should be consistent with the Trust's core values. Social media users should be respectful and honest, and should avoid comments which are derogatory about:

- an employee of the Trust;
- the actions someone has taken on behalf of the Trust;
- individuals and organisations associated with the Trust or their activity on behalf of the Trust

5.2.2 Everything we say online is in the public domain and messages intended for friends and family can be circulated wider than the intended audience. Staff should always consider whether people or organisations other than the intended recipient would consider their communication to be appropriate.

5.2.3 Individuals must:

- act in the best interests of service users and carers
- demonstrate respect and maintain the dignity of colleagues and other organisations that they have contact with in the course of their work-related duties. Derogatory or negative social media comments about colleagues, even if made outside of work time, may be in breach of the Trust Dignity at Work Policy
- respect and maintain the confidentiality of service users and carers
- not post any sensitive or confidential information about a service user, carer or colleague, such as information about their health or personal life
- keep high standards of personal and ethical conduct
- avoid making spurious or malicious comments about individuals or organisations
- Identify their relationship with the Trust when making comments about the Trust
- not use an alias when discussing the Trust, which can mislead people about their connection with the organisation
- behave with honesty and integrity and make sure that their behaviour does not damage the public's confidence in them, their profession or professional colleagues, the Trust or other organisations with which the Trust works
- clearly state that all opinions are their own
- abide by all relevant professional codes of conduct
- notify the Trust Secretary, their line manager, HR Manager or any senior manager of any information that they see in a public forum that raises concerns because it appears to contain sensitive or confidential information
- ensure that they don't breach any Trust policies

- not reveal any information pertaining to Trust systems, processes, internal structures or Intellectual property unless explicitly authorised to do so by a relevant manager and within their professional role.
- 5.2.4 Staff are responsible for their own online communications and should ensure that posts are accurate and factual. Posts should not be misleading or potentially damaging.
- 5.2.5 Other organisations and individuals may see posts shared online. Staff should make sure that they do not disclose sensitive or commercially confidential information.
- 5.2.6 Staff should not appear to speak on behalf of the Trust unless authorised to do so in an official capacity. This is separate to staff sharing information or comment about the Trust which is encouraged within the parameters of this policy.
- 5.2.7 Staff should acknowledge any copyright and credit the authors of any other material such as text or images, that they may wish to use. Where possible, they should include a link to the source.
- 5.2.8 Work time should not be used for non-work or social activity. Individuals may use their own devices such as mobile phones to access social media sites during break times while at work. They may also use social media during work time where there is a clear link with their role or they are assisting with spreading news and information shared on the Trust's social media channels. The Trust allows access to social media from work computers, but this is only to be used in the aforementioned capacity.
- 5.2.9 Any work-based disagreements, issues or concerns should be dealt with by following the appropriate Trust procedure and policy. Information should not be shared or discussed on social media and contact from service users on social media should be politely discouraged.
- 5.2.10 The Trust's official social media presence is managed by the Communications Team. The team is authorised to publish content on social networking and blogging sites on behalf of the Trust. Teams should not set up or use social networking pages or sites to represent the Trust unless authorised to do so by the Communications Team.

Any GHC team or service that would like to set up its own social media account on any platform must contact the Communications Team by emailing ghccomms@ghc.nhs.uk.

- 5.2.11 Where teams/services have been authorised to use social media on behalf of the Trust, all account profiles belong to the Trust and log-in credentials should be shared with the Communications Team to allow the Trust to access and use the social account.
- 5.2.12 The Communications Team will provide advice, guidance and training to teams on setting up and managing their social media accounts, including standard

responses to enquiries. Ad-hoc checks regarding content will be taking place. If using copyrighted content, teams should mention their source or ask for authorisation to use the content

5.2.12 As of March 2025, the Trust is no longer actively posting on X/Twitter, due to the proliferation of extremism and hate speech being promoted on the platform. These views do not reflect the Trust's values and our commitment to Equality, Diversity and Inclusion. Therefore, as of March 2025 we will only share posts on Twitter when there is a need to update the public on an issue concerning public health or safety, or where we have a need to correct misinformation about Trust services or respond to direct questions or queries. This applies to the Trust's corporate account as well as any other Trust accounts run by colleagues.

For the avoidance of doubt, we will post about:

- Infection prevention and control, i.e. visiting restrictions, hand hygiene etc.
- Changes to Trust services, whether temporary or permanent
- Any incident involving Trust services where we need the public to take a specific course of action
- Any other information which is deemed to be important for the health, safety and wellbeing of our colleagues, people who use our services and the population we serve

We will not use X/Twitter to post about:

- Recruitment and training
- Awards and successes
- Appointments to Trust Board
- Any other information which is not important for the health, safety and wellbeing of our colleagues and people who use our services

5.3 BREACHES OF THIS POLICY

5.3.1 Any breach of this policy by an employee may be considered to be a disciplinary matter and any allegations that are upheld may constitute gross misconduct. In addition, where individuals are named and allegations made on social networking media, criminal and civil action could follow. For example, where a statement is considered defamatory, social media users could be prosecuted under defamation laws such as the Defamation Act 2013. This policy does not replace the current legal framework, and adherence to this policy will not constitute a defence in the case of any action brought by a complainant against a social media user.

5.3.2 Where other individuals are found to have breached this policy, the Trust reserves the right to take any appropriate action to limit or reduce further contact with the Trust.

PART 3 – EXPLANATORY INFORMATION

6.0 DEFINITIONS

- 6.1 Disrepute means generating unwelcome publicity about the Trust or the NHS or otherwise having an actual or potentially adverse effect on the reputation of the Trust or the NHS
- 6.2 Social media users includes Executive and Non-Executive Directors, Governors, employees (including those on fixed term contracts and Bank staff), contractors, Experts by Experience and volunteers
- 6.3 Social Networking is the term commonly used for websites which allow people to interact with each other by sharing information, opinions, knowledge and interests.

Examples of social networking sites include Facebook and Twitter (social networking), LinkedIn (professional networking) YouTube (video sharing), Flickr (image sharing), Instagram, Wikipedia (wiki), TikTok and del.icio.us (bookmarking). This is not an exhaustive list.

- 6.4 Instant messaging is a way of communicating from one user to another and differs from email and some other social networking services in that the conversations happen in real-time. Some examples of instant messaging tools include WhatsApp, Snapchat and Messenger. These are sometimes used by colleagues to communicate privately but rules are in place to govern the use of these private forms of communication. This is not an exhaustive list.
- 6.5 Blogging is using a public website to write an online diary (known as a blog) sharing thoughts and opinions on various subjects. The word blog is derived from the phrase (we)b log. Some examples of blogging websites include Twitter.com (a microblog site), Blogging.com and Blogger.com. This is not an exhaustive list.
- 6.6 Vlogging is using a public website to broadcast films and recordings sharing skills, thoughts and experiences on various subjects. The term means 'video blogging'. The most popular sites for vlogging include Vimeo and YouTube. This is not an exhaustive list.

7.0 PROCESS FOR MONITORING COMPLIANCE

- 7.1 Managers will monitor compliance within their work area, and take appropriate action – seeking advice from the Communications Team and Human Resources as appropriate - when infringements of this policy are brought to their attention.

8.0 TRAINING

- 8.1 Further guidance and training will be provided by the Trust as required or as requested.

- 8.2 Any colleagues using their personal social media accounts in a work capacity can contact the Communications Team, who are able to provide support, guidance and tips.

9.0 ASSOCIATED DOCUMENTS

- Policy on Promoting Dignity at Work
- Grievance Policy
- Disciplinary Policy
- Use of Internet and Email Policy
- Whistleblowing/Freedom to Speak Up Policy Equality, Diversity and Inclusion Incident Roadmap [Equality, Diversity and Inclusion Incident Roadmap - Interact](#)