NHS Wales
All Wales Social Media Policy

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1. Introduction

NHS Wales organisations are making increased use of Social Networks to communicate with patients, service users, staff and other stakeholders to deliver key messages for good health care and other useful services. However, with its use, NHS Wales organisations have a responsibility to ensure that the operational effectiveness of its business and the security of its information assets are protected and its reputation maintained.

This policy governs the conduct of all staff (including contractors, agency and temporary staff) of NHS Wales with the aim of ensuring that they are aware of their personal responsibilities for appropriate use when using such social media facilities.

2. Purpose

This policy aims to:

- empower and support staff in making effective and appropriate use of social media tools as an appropriate part of their work to communicate and engage;
- help staff get the best out of the tools available whilst maintaining a safe professional environment and protecting themselves as well as the organisation;
- provide guidance to staff on their personal responsibility as an employee of NHS Wales when using any social networking site;
- make staff aware of the issues relating to the use of social media for both private and professional purposes;
- provide employees with information to consider before participating in or developing any new social media application;
- ensure staff are aware of relevant legislation and standards in relation to the publishing of information online, including codes of practice issued by professional and regulatory bodies and the implications of using social media inappropriately;
- to provide direction on further advice and information;

3. Scope and Application

This policy applies to all NHS Wales staff, locum staff, students, trainees, secondees, volunteers contracted third parties and others (permanent or temporary).

It sets out staff's responsibilities when using social media and the implications involved. It is intended to outline areas of best practice and illustrate where challenges can arise for individuals and NHS Wales.

It applies to the use of social media for business and personal purposes, both at work and outside of the work environment; i.e. in one's own time, using one's own or NHS equipment and personal or organisational social media accounts or identifiable Internet presence.

For the purposes of this document it should be understood that the term social media is used in reference to all Internet social networking and media sharing sites, (such as Facebook, Twitter, YouTube, Snapchat, Instagram, Flickr etc.) and to all 'blogs', 'chat', on-line commentaries, diaries, discussion forums, 'wikis' and sites allowing the posting of user generated content for mass consumption.

4. Principles

NHS Wales organisations recognise the role and value of social media as a means of communication and of improving the way it reaches out and interacts with different communities internally and externally. It also has a duty to protect its staff and services users from the potential risks around its use. These risks need to be identified and managed so that the benefits of social media can be realised in as safe a manner as possible.

The organisation acknowledges everyone has a right to express themselves using social media. It also recognises its role in offering advice on safe use of social media and highlighting the responsibility of individuals to be aware of the potential consequences of posting content on to publically accessible platforms.

The blurring of boundaries between a person's private and professional life on social media is recognised and it is important that staff understand and are mindful that inappropriate use could damage their own reputation as well that of others, including family, friends and colleagues and NHS Wales. NHS Wales staff have a responsibility to adhere to this national policy.

5. Best practice

Here are some key points and advice to consider when using social media in either a professional or personal way. More detailed advice is available in appendices A and B.

Be yourself – identify who you are and whether you are speaking on behalf of an organisation, if commenting in a personal capacity make sure that it is made clear the views are your own.

It is a public space – remember that by posting information online you are publically publishing that content and it will be available to a wide audience. Even when posting to 'closed' or 'private' groups that information can be copied, shared and used by others in ways you may not have considered. Never say anything that you wouldn't stand up and say in a public meeting.

Respect others – adhere to the values and principles around respect and dignity championed by NHS Wales and your local organisation. Rules around bullying and harassment are as valid online as they are in the physical world. Consult your policies and professional codes of conduct for more details. Do not post pictures or information about others without their consent. Do not publish obscene words, pictures or videos.

Respect yourself and your organisation – whether you are clearly identified as an NHS Wales staff member or not, your words and actions online can act as an ambassador for your organisation. Do not post anything that would bring yourself or NHS Wales into disrepute. There are many channels to share grievances and raise concerns and they should be used appropriately.

Respect patients – the strict and legal obligations around patient confidentiality extend to the online world both when using social media for private and professional use. Never post any information that could breach these rules.

Do it right – do not begin or set up any professional social media account without first consulting with your local Communications Team and securing its support. There are rules and governance arrangements in place to make sure standards are consistent and the staff and the local organisation are properly supported and protected.

All staff have a responsibility to be aware and to follow this policy. Online activity is governed by the same rules, policies and procedures around behaviour and conduct Appendices A and B provide guidance on use and unacceptable behaviours.

Any staff who are in any doubt about what they should or should not post on social media sites – particularly about their work – or who discover online content that may harm the reputation of their organisation, should contact their local Communications Team, Workforce and OD Team and/or their Information Governance Team.

6. Business Use of Social Media

Business use of social media may include:

- Creating and/or managing content on a social media site created, branded and managed by NHS Wales or the Local Health Board or Trust;
- participation in third party professional forums and/or discussion boards relating to one's work;
- the monitoring of social media for business purposes.

Local restrictions are generally in place to ensure that only those members of staff having a genuine business need are given access to organisational social media pages and can issue corporate or organisational statements and update content. Anyone wishing to develop a social media site or application on behalf of the organisation should speak to their Communications Team in order for them to provide advice and guidance on the local approval process.

Anyone speaking in any kind of professional capacity or deploying social media on behalf of NHS Wales or their local organisation has a responsibility to conduct themselves in an appropriate manner, as they should when addressing the media or any public meeting or forum.

Staff are encouraged to participate in or contribute to professional forums relating to their area of work. Where an employee is called upon to publish content in a professional capacity on a social media web site, the following guidelines apply:

- Before participating, approval should be sought from your line manager;
- you should clearly identify yourself as an employee of NHS Wales;
- you should only provide information about your work location if it is absolutely essential;
- be professional **-** make sure you are seen to act in an honest, accurate, fair and responsible way at all times;
- obtain appropriate 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 approval;
- respect copyright when including or linking to images or other material.

In addition staff should never:

- Mention **any** information relating specifically to an individual patient or client or other member of the public where there is any possibility that that individual can be identified, unless written consent has first been obtained from the data subject or their appointed representatives;
- endorse or appear to endorse any commercial product or service;
- voice political opinion in the course of their NHS work/capacity.

7. Personal Use of Social Media

The personal use of social media is a common part of day to day life for many people. Some are rightly proud to be NHS Wales employees and may actively use social media as part of their professional development or highlight their role as part of their online biography.

It is important for individuals to understand their role as ambassadors for their organisation and to be conscious of the impact of their actions and words online which may negatively impact on the reputation and trust of the public.

The relationship with social media changes as soon as staff identify themselves or are identified as employees of NHS Wales or their local health board or trust. In these circumstances they must make it clear that any views and opinions are personal and not necessarily those of their employer.

As an NHS Wales employee it is important to remember that expressing views or commenting on content on the Internet in relation to the NHS cannot be divorced from one's working life. Unguarded comments in relation to one's work, one's working environment, one's colleagues, patients, carers, visitors, suppliers and contractors etc. can bring the organisation into disrepute and may invite legal action against both the employee and their employer.

Where the NHS site uses public Wi-Fi (wireless fidelity network) staff are encouraged to use their own personal device to use any social media channels they wish to access. Personal use of social media, should not be allowed to interfere with the performance of one's duties and any such access should occur during breaks or outside of normal working hours.

8. Harassment, bullying and 'trolling' on social media

If staff believe they are being harassed, bullied or victimised as a result of another member of staff's post to an internet site, they can take action. Staff should access bullying and harassment policies which outline the informal and formal action that can be taken.

Alternatively, they can inform their line manager or an adviser in HR, or report the incident to the police or to the social media site.

A new and unwelcome trend in social media is trolling – where someone looks to upset and provoke an argument by posting inflammatory statements. This is an offence under the Malicious Communications Act.1988.

If you are being targeted by a troll do not respond. You can report their behaviour via the social media site or through the police. Contact your local Communications Team for advice and support.

9. Patient and public use of social media

Patients and the public are free to use social media while on NHS Wales sites and are supported in this by the availability in many places of free WiFi facilities.

However, whilst on NHS Wales sites they are asked to be mindful of the dignity of other patients, the public and staff. They should not take photos of others or post their names and or other details online without their express permission.

Failure to treat others in this way and to show respect for the rights of other patients, the public and staff will result in action being taken in the same way as any other inappropriate behaviour.

10. User Responsibilities

In order to minimise the risks inherent in using social media, to avoid loss of productivity and to ensure that adequate IT resources are available for business purposes, all staff are expected to adhere to this policy.

11. Monitoring and Compliance

NHS Wales reserves the right to monitor Internet traffic using its network infrastructure. Local Health Boards and Trusts may monitor and log comments and references on social media sites (including those made by their own staff) relating to themselves, their staff, their services and the patients in their care.

In addition, staff and contractors are encouraged to report any contravention of this policy that they become aware of via the local incident reporting process. It is the responsibility of the appropriate line manager to investigate any reported breaches and these will be dealt with in accordance with the All Wales Disciplinary Policy.

Where the organisation considers material published by staff in a personal capacity on social media sites to be in contravention of this policy then it may:

- ask for the material to be removed;
- undertake an investigation into the facts, seriousness and implications of the publication which may result in disciplinary action (in line with the relevant disciplinary policies);
- report the individual to their professional registration body (which may then decide to undertake their own investigation and action);
- report the individual to the relevant legal authorities.

Failure to adhere to this policy may lead to disciplinary action up to and including dismissal, depending on the individual circumstances of the case. Staff are also advised that the following action may be taken by third parties:

- A breach of the law may lead to criminal prosecution.
- A person or company may take civil action and sue an individual for damages if defamation of reputation can be demonstrated.
- Harassment is a criminal offence for which the harasser can be imprisoned. Victims of harassment may also be able to claim damages from the harasser.
- A copyright owner may sue an individual for damages in the event of breach of copyright.
- Accessing and transmitting sexual material may be a criminal offence. The courts may take action against individuals where appropriate.
- Professional bodies and organisations have regulations and guides in relation to professional conduct when using social media. In breaching these, staff may be subject to action by these organisations (which may include the loss of professional registration).

This is not a complete list and there may be other actions not shown above.

12. Supplementary

Use of the Welsh Language

All corporate Social Media channels must comply with local Welsh Language Policies and Procedures.

Training

Training relating to this policy must take place during the induction programme for new staff or as part of refresher training at least every two years as part of the Information Governance and/or Information Security training.

Definition and Terms Used

Definitions of many of the terms used in this Policy are contained in Appendix C.

13. Review and revision arrangements

Maintenance of this policy

This document is issued and maintained by the NHS Wales Informatics Service (NWIS) on behalf of the Health Boards/Trusts, following approval by the Information Governance Board and Welsh Partnership Forum.

This policy will be reviewed as per the review date on the policy front sheet or as agreed by the Information Governance Board and the Welsh Partnership Forum, however it will be reviewed on an ad-hoc basis particularly where they are affected by major internal or external changes such as:

- Legislation;
- Practice change or change in system/technology; or
- Changing methodology.

Appendix A – Staff Guidance on the Use of Social Media Sites

This Guidance should be read in conjunction with the Social Media Policy.

- Always read the terms and conditions to understand what you are signing up to. If in any doubt seek the advice of your Information Governance department.
- Restrict the amount of personal information you post online to an absolute minimum and make use of site security settings to hide any information required by the site but not essential to your use of the site.
- Use a unique complex password to log into the site.
- Remember that you are personally responsible for anything you post online.
- Restrict from public view comments made on your profile page until you approve them, bearing in mind that you may be liable for the comments of others appearing on your profile.
- Never comment with anything that you would not wish others to hear.
- As with any other medium, do not give out any information about staff, contractors, patients, service users or other potentially confidential information on social media. Business correspondence must be made using internal channels (e.g. email) where an internal user can be verified via the internal address book.
- Do not send personal or other sensitive information via a social media site.
- If you are subject to a social engineering, hacking, virus intrusion or blagging incident in a work capacity and on a work social media channel you must report this immediately via the NHS Wales' incident reporting system (Datix).

Appendix B – Unacceptable use of social media

Staff should **never:**

- divulge or share confidential or personal identifiable or sensitive information in relation to patients carers or staff;
- post any material or information that may undermine the dignity or be detrimental to the care and well-being of, patients, carers, staff or others;
- post any material that represents an invasion of patient or staff privacy;
- post inappropriate comments about patients, staff members or others – this includes discussion of work-related issues, conversations about patients and complaints about colleagues;
- use social media to bully or intimidate a member of staff;
- post any material that falsely or misleadingly represents the views, standards or performance of NHS Wales or their local health board or trust;
- claim to speak on behalf of NHS Wales or the local organisation without appropriate approval;
- publish any material, including images that has been obtained at work or as part of one's profession or during the performance of one's duties, without appropriate approval;
- use social media in any way which brings the NHS or the individual's profession into disrepute;
- use defamatory, obscene, hateful, pornographic, violent, terrorist, racist, sexist, homophobic, transphobic or otherwise illegal, offensive or discriminatory language or material;
- make comments that can be interpreted as defamatory, demeaning, inflammatory, indecent or unlawful;
- use social media in any way which is illegal;
- accept a 'friend' request from a patient or client (or their family member) who is **only known** through their work for the NHS;
- use their work email address as part of a personal login / registration on a personal site.

Appendix C - Definitions

Social Media: Websites and applications that enable users to create and share content or to participate in social networking. *[Oxford English Dictionary]*

Social Networking: The use of dedicated websites and applications to interact with other users, or to find people with similar interests to one's own. *[Oxford English Dictionary].* Examples include Facebook, Bebo, Myspace, Twitter and Linkedin.

Social Engineering: Obtaining information by masquerading as a person with a bona fide interest in that information (e.g. a member of an organisations staff) by use of social skills.

Blagging: Obtaining information on another person, usually by assuming a false identity, without that other persons knowledge or consent.

Note: Social Engineering and Blagging are sometimes interchangeably used in the wider sense of obtaining information to hack systems or phone services; or to fool people into disclosure of any related information by trickery)

Blogging

A personal website or web page on which an individual records opinions, links to other sites, etc. on a regular basis. *[Oxford English Dictionary]*

Micro-Blogging or Tweeting

A social media site to which a user makes short, frequent posts. *[Oxford English Dictionary]*