Social Media and Digital Policy

Document Reference: POL078
Document Status: Approved
Version: V 1.0

DOCUMENT CHANGE HISTORY

<table>
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<th>Initiated by</th>
<th>Date</th>
<th>Author (s)</th>
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<tr>
<td>Head of Communications / Digital Manager Communications team</td>
<td>17/5/2018</td>
<td>Head of Communications</td>
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<th>Date</th>
<th>Comments (i.e. viewed, or reviewed, amended approved by person or committee)</th>
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<tr>
<td>Draft V0.2</td>
<td>24/05/18</td>
<td>Digital Manager</td>
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</table>
| Draft V0.2 | Circulated on 30/5/18 | Circulated to Policy Steering Group ahead of meeting on 1/6/18  
Circulated to Interim Head of Communications and Engagement for comment |
| Draft V0.3 | 01 June 2018 | Review by HR Policy Group and Head of Communications                          |
The East of England Ambulance Service NHS Trust has made every effort to ensure this policy does not have the effect of unlawful discrimination on the grounds of the protected characteristics of: age, disability, gender reassignment, race, religion/belief, gender, sexual orientation, marriage/civil partnership, pregnancy/maternity. The Trust will not tolerate unfair discrimination on the basis of spent criminal convictions, Trade Union membership or non-membership. In addition, the Trust will have due regard to advancing equality of opportunity between people from different groups and foster good relations between people from different groups. This policy applies to all individuals working at all levels and grades for the Trust, including senior managers, officers, directors, non-executive directors, employees (whether permanent, fixed-term or temporary), consultants, governors, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with the Trust.

All Trust policies can be provided in alternative formats.
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Appendix 1 Equality Impact Assessment
1. Introduction

Any reference to social media includes social networking sites and channels, examples of which are detailed in section 6 of this policy.

The Trust’s Internet Use Policy, deals with the use of web-based systems in the workplace. This policy, instead, sets out the principles which Trust staff and volunteers should follow when using social media, whether they are using a Trust-approved corporate account and/or using personal accounts.

The intention of this policy is not to stop Trust employees and volunteers from conducting legitimate engagement and communications on social media, but serves to highlight those areas in which problems can arise for both individuals and the Trust, threatening someone’s role or position and the reputation of them and the organisation.

Because of the nature of emerging digital changes and new platforms coming on board annually, it is impossible to cover all circumstances but the principles in this policy should always be followed.

2. Purpose

This policy aims to ensure that employees and volunteers use of social media does not damage the Trust’s reputation, that patient confidentiality is adhered to at all times, and that it is an environment where individuals are treated with dignity and respect.

This policy encompasses use of social networking in both a professional and personal capacity and aims to provide guidance to employees and volunteers to protect themselves while using social media.

3. Duties

3.1 Human Resources Department

The Human Resources Department is responsible for keeping the provisions within this policy in line with employment legislation, best practice people management principles and NHS guidelines.

3.2 Managers, HR and Trade Union Representatives

Managers, HR staff and trade union representatives are responsible for providing advice and guidance to employees on the application of this policy and procedure.

3.3 Employees

Employees are responsible for making every effort to provide information and documentation that is requested of them or they feel relevant to the operation of this policy and also for complying with the processes and agreements contained within this policy.

3.4 Consultation and communications with stakeholders

It is approved by the Staff Partnership Forum, which includes representatives from Unison, HR and Management. This policy has been written in partnership by management and staff side, and in accordance with current employment legislation.
4. **Definitions**

Digital media – In this policy, this includes platforms which enables users to communicate their thoughts, opinions or observations with other people.

Trolling – Where a social networking user writes a deliberately provocative posting with the aim of inciting an angry response, usually with contents that are hurtful and/or personal.

5. **Development**

5.1 **Prioritisation of work**

This policy has been developed to offer guidance to everyone about the expected level of conduct when using social media.

5.2 **Identification of stakeholders**

Primary stakeholders are the Chief Executive, Director of Workforce, Head of Communications and Engagement, and the Information Management & Technology department.

5.3 **Responsibility for document’s development**

The Head of Communications is the author of this policy, developed with the Digital Communications Officer. It is recommended to the HR Policy Group, the Trust’s Staff Partnership Forum, Senior Leadership Board and Executive Leadership Board for ratification.

6. **The scope of social media**

Social media channels enable people to broadcast their thoughts, opinions or observations, and users engage with one another on a range of topics for a variety of purposes. The platforms include, but are not limited to:

- Facebook
- Twitter
- LinkedIn
- Google Plus
- Instagram
- Snapchat
- online message boards/forums/chat rooms
- YouTube
- Flickr
- blogs (where people can comment on articles)
- podcasts (where people can comment on content)
- discussion boards, e.g. Google Groups
- collaborative information sharing sites, e.g. Wikipedia.
These allow people to network, build communities, and collaborate on ideas and work. For instance, facebook provides what has become an integral way for people to keep in touch with friends and colleagues. This does mean, however, through the potentially public nature of such sites it is also possible for third parties to collate vast amounts of information.

When someone clearly identifies their association with EEAST and/or discusses their role, they should behave appropriately and in ways consistent with the Trust's values, expected conduct, and their individual responsibility as an employee or volunteer. Relevant professional codes of conduct also apply to some roles including healthcare professionals and NHS managers for example HCPC guidelines can be found at: https://www.hcpc-uk.org/

6.1 Privacy

Staff and volunteers should be mindful of the personal information they disclose on social media platforms, to reduce the risk of identity theft and data breaches. Making information such as your date of birth, your place of work, and other personal information publicly available is high risk.

In relation to privacy, there is a perception for example, that because Facebook users can limit access to their Facebook profile to ‘friends’, that the information within their profile is confidential. However, when a photograph is uploaded to Facebook, they have a royalty-free, sub license, and worldwide license to use it, subject to its terms of service which you agree to when you sign up.

6.2 Trust access

Social media users can post a great deal of information which can be circulated rapidly at the touch of a button and become instantly accessible to other users.

In other words, this information enters the public domain and the subject loses control of its ownership. The information shared on social media can also be exploited by other users – not necessarily for negative reasons, but often because of this - and staff and volunteer's names are easily searchable. Anyone with an ‘open’ account i.e. easily accessible through searches should consider these two examples as a means of helping EEAST protect its employees and volunteers.

6.3 Third party access

Information shared on social media can be used and possibly exploited by other users, but also employee's and volunteer's names can be easily searched for. Examples could include:

Journalists wishing to gain information about EEAST or patient-facing incidents by reviewing social networking entries (a # on Twitter might lead them to a staff or volunteer's individual account) or searching for names on sites and making contact should be referred to the Communications Team, unless you have given reporters express permission to be contactable on social media e.g. you’re running an event or are the subject of a feature they’re running.
Patients wishing to contact clinicians following an incident and use social networking sites as a gateway should again be engaged with positively but referred to the PALs team to make formal contact.

7. Employees and volunteer conduct online and using social media

7.1 Everyday use

Everyone has the right to be digitally engaged and use social media platforms, and EEAST acknowledges that people do so because there are benefits and advantages when using these platforms appropriately. Because social media has become integral to people’s day to day activities and thus there is potential to reach more audiences, EEAST has long-established Facebook, Twitter, Instagram, and YouTube accounts to engage with stakeholders. There are also internal-only engagement tools including Facebook ‘crew rooms’ (EEAST staff-only membership on private groups) and It should be noted here that the Need to Know rolling news site – where staff can comment on articles – forms part of this.

The Communications and Engagement team is responsible for running the social media accounts under the corporate banners of @EastEnglandAmb and other handles, whilst several senior leaders currently run their own corporate Twitter accounts with arm’s length guidance and oversight from central Communications.

Other Facebook groups have been set up and run by other members of staff and volunteers.

7.2 Expected standards

Hundreds of employees and volunteers regularly engage on social media and it is expected that they should use any platform and channel responsibly and with regards to the content in this policy.

Employees and volunteers should always verify any information for accuracy when using social media, and expressly state that the views and comments made are personal ones and are not related to EEAST when using public-facing channels. However, just doing this alone doesn’t protect a person from consequences – no-one can act with impunity and have no repercussions because of this disclaimer. An account holder is still held accountable for those statements/comments and this can affect you in employment tribunals.

Employees and volunteers have a duty to conduct themselves in a professional manner, and to post or withhold information in accordance with the following:

- Patients must not be identifiable. Only those who have given consent to share images or information can be featured in posts, and only then if you know they have capacity to agree to the terms of sharing their image / information e.g. ambulance ride-outs, insight days, public-facing events. This information, consent and the right to withdrawal consent must be managed and processed in accordance with current Data Protection Legislation

- No confidential or personal information about other employees or volunteers must be shared without their express consent. This information, consent and the right to
withdrawal consent must be managed and processed in accordance with current Data Protection Legislation. An example is a photo celebrating a career milestone (training, award, etc.); the individuals / group involved must give their express consent for it to be shared before a photo is taken. Should someone not wish to give their consent, this is their individual choice and you should instruct them to stand aside whilst a photo is taken.

- The Trust does not proactively report on incidents. Media enquiries about incidents are handled and recorded via the Trust media desk, as well as enquiries made on social media by journalists. Therefore, staff and volunteers should not be posting publicly about incidents or responding to posts giving more details. For those who run Trust corporate accounts and therefore who have been given additional guidelines in engagement on social media, any reactive information about incidents should be redacted to: geographic area and responses dispatched, and photos should not contain any information or imagery that can lead to the identity of the people at the scene. This includes vehicle registrations, distinctive vehicles and branded vehicles.

- Posting any information must adhere to the Terms of Use of the relevant platform, as well as copyright, defamation, discrimination, harassment and other applicable laws.

- Employees and volunteers should be aware that posts may bring the Trust into disrepute in circumstances where they contain slurs, demeaning or inflammatory comments regarding individuals and/or EEAST as an organisation. If this is found to be the case this can result in disciplinary action. This includes posts relating to another NHS organisation, third party, regulatory or voluntary organisation.

- Accounts and/or postings should not be created and/or used as a means of attacking or abusing employees, volunteers, patients or anybody connected to the work of EEAST.

7.3 Disclosing employment and volunteering at EEAST

Employees and volunteers using channels which require users to confirm their employer name, professional qualifications and experience (e.g. LinkedIn) must consider the principles set out above before making any entries. Ensure that professional and personal uses are not confused; this can include disclosing employment indirectly, posting photos / videos from vehicles or in uniform.

Jigsaw identification – separate items of information that create a ‘data’ picture about someone – will leave you open to security issues if on separate profiles there is different information about you that together builds a picture of where you live, your DOB, your place of work, etc.

7.4 Contact from a third party

If employees or volunteers are contacted by a third party (e.g. media, former patient, partner organisation/stakeholder) about comments or entries they have on social media which is connected with EEAST, they may acknowledge the content if they wish and should contact their line manager before responding. The line manager may wish to consult the Communications Team or Human Resources Department for advice and/or guidance. If the contact is from a patient or their family, they should be directed to PALs to ensure it is recorded within Patient Services / Experience.
7.5 Mental health and wellbeing

If employees and volunteers post on social media when feeling either upset and / or angry, it can attract unwanted and inappropriate comments. Even deleting a comment after it’s been made may not prevent it from having been circulated early on – screen shots of comments can be, and are, taken of posts which are then separately shared around for legitimate purposes or inappropriately.

Therefore, employees and volunteers are strongly advised not to post any contentious or emotive work-related issues - even with strict privacy settings, as there is no guarantee how the information may be quoted, copied or shared by others who may or may not have been the intended recipients. The Trust’s Wellbeing Hub is in place to help people talk though issues and help reduce the possibility of posting something they would later come to regret.

7.6 Potential outcomes

Breach of this policy will be managed in line with the EEAST’s Disciplinary Policy. Employees, CFRs and volunteers must maintain both patient and colleague confidentiality as outlined in this policy.

8. Personal profiles/blogging

8.1 Attributing profiles to the Trust

If employees or volunteers plan to write in a personal capacity online e.g. blogging, they must decide whether they wish to expressly mention EEAST. Employees and volunteers are advised that even if they decide not to disclose working or volunteering for EEAST, it may still be possible for users to link comments/disclosures with EEAST through jigsaw identification.

8.2 Managing your social media profiles

Employees and volunteers are responsible, liable and accountable for everything that they post online. This includes posting on their own social media and comments and responses made to others blogs and social media posts.

If a third-party posts something in your profile which could breach the principles set out within Section 7 above, you must take a screen shot of the entry, remove the whole post or hide responses where applicable and contact your line manager/reporting lead to make them aware. If applicable, it is advisable to report the breach to the platform itself to take appropriate action.

If an employee’s or volunteer’s account becomes compromised i.e. hacked, then they have a responsibility to resolve the matter as soon as they are aware of the situation which may include removing all entries not made by themselves and taking steps to ensure the security of their account.

Employees and volunteers are responsible for maintaining the security and integrity of any passwords and access to social media platforms.
9. **Photos, artwork and other imagery**

9.1 **Sharing/posting of photos, artwork and other imagery**

Employees and volunteers may not post anything which depicts any EEAST-identifiable uniform, vehicle, crest or other branding in a negative light and/or may bring EEAST into disrepute. Additionally, photos may not be posted which:

- reveal confidential information about a patient or colleague
- depict the day to day activity of EEAST in any form without prior consent of an appropriate manager
- knowingly compromise any on-going investigation by EEAST or a third party
- may bring the Trust into disrepute.

9.2 **Production of photos or videos**

No photos may be taken during work or volunteer time for social media posts, unless they are for the benefit of EEAST and are to be used through official communication streams.

Members of the public record our employees and volunteers responding to patients or at events. For instance employees and volunteers should not reference or link their profiles to such entries.

Any instances of being filmed by the public whilst carrying out EEAST business should be reported to a line manager /EEAST lead and via Datix as soon as possible.

10. **Respecting others on social media**

Whilst there is an expectation by many colleagues, stakeholders and members of the public that EEAST employees and volunteers will share positive work-related information on social media that they’re involved in, no assumptions should be made that everyone is comfortable with their image or information being put out in the public domain.

For example, there may be an expectation that photographs taken at a private EEAST event will not appear publicly on social media, both from those present and perhaps those not at the event. Employees and volunteers should be considerate to their colleagues in such circumstances and should not post information when they have been asked not to. They should also remove information about a colleague if that colleague asks them to do so.

Under no circumstance should offensive comments be made online about any colleagues or patients as this may amount to cyber-bullying and could be deemed a disciplinary offence.

11. **Accessing social media using the EEAST IT System and for EEAST-related work**

Under EEAST’s Internet Use Policy, no employee has automatic access to all social media using a device such as a Trust PC. Where employees can access a platform, they
must note that engaging in any kind of online activity which is not work related is strictly prohibited.

It may be necessary for some staff to engage in social networking due to the nature of their role e.g. Communications, those with corporate Twitter accounts. In cases where staff believe they require access, they need permission from their line manager and only then use social media for justifiable business activities. In addition, the Trust’s Digital Communications Officer should be made aware of the account details as all EEAST-associated social media accounts will be monitored by the Communications Team.

Anyone accessing social media on an EEAST device, particularly if it is a shared PC or used in an open work space, must logout to reduce the risk of your profiles being accessed by unauthorised people.

Exiting the browser or turning the machine off will not be enough.

12. **Identifying individuals**

Employees and volunteers must not attempt to gain information about individuals and/or organisations through social media. This is to protect themselves and/or the Trust from any assertion that they have gained information about a third party which could compromise any EEAST process. This is particularly for:

- recruitment - unless an applicant specifically directs the recruiter to a site or area for the purposes of making their application
- procurement - unless a tender process requires the Trust to review information held online in a legitimate manner.

13. **Policy review**

This policy will be reviewed on an annual basis or amended in the light of new employment legislation and/or relevant case law

14. **Equality Impact Assessment**

An Equality Impact Assessment date is yet to be confirmed

15. **References**

Dignity at Work Policy
Disciplinary Policy (Managing Conduct and Performance)
Digital Communications Strategy
Internet Use Policy

16. **Associated documents**

Dignity at Work Policy;
Disciplinary Policy (Managing Conduct and Performance);
HCPC Guidance
# Equality Impact Assessment

## EIA Cover Sheet

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<td>Name of assessment lead or EIA assessment team members</td>
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<td>Strategy</td>
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<td>Training programme.</td>
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# Equality Analysis

**What is the aim of the policy/procedure/practice/event?**

Sets out guidance and advice for all staff and volunteers on the use of social media in a work context, guidance regarding posting on own social media and protocols regarding reference to EEAST and others.

**Who does the policy/procedure/practice/event impact on?**

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<td>Age</td>
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**Who is responsible for monitoring the policy/procedure/practice/event?**

HR

**What information is currently available on the impact of this policy/procedure/practice/event?**

Feedback to the Communications team from staff regarding applying and adhering to this policy.

**Do you need more guidance before you can make an assessment about this policy/procedure/practice/event?**  No

**Do you have any examples that show that this policy/procedure/practice/event is having a positive impact on any of the following protected characteristics?**  Yes, If yes please provide evidence/examples:

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Please provide evidence:

The policy enables a consistent approach and protects all staff and volunteers equally, both in ‘corporate media’ settings and when using and posting on own personal social media platforms.

**Are there any concerns that this policy/procedure/practice/event could have a negative impact on any of the following characteristics?**  No, if so please provide evidence/examples:

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Please provide evidence:

**Fair to all**
### Action Plan/Plans - SMART

- **Specific**
- **Measurable**
- **Achievable**
- **Relevant**
- **Time Limited**

### Evaluation Monitoring Plan/how will this be monitored?

- **Who**
- **How**
- **By**
- **Reported to**