



Social Media for Business Use Policy

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The provisions of this policy, which was developed by a partnership group on behalf of Grampian Area Partnership Forum, Apply equally to all employees of NHS Grampian except where specific exclusions have been identified.

NHS Grampian
Social Media for Business Use Policy

This document is also available in large print and other formats and languages, upon request. Please call NHS Grampian Corporate Communications on Aberdeen (01224) 551116 or (01224) 552245.

This Policy has undergone Equality and Diversity Impact Assessment.

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NHS Grampian

Social Media for Business Use Policy

1 Introduction

Social Media is a popular communication channel for governments, businesses, high profile individuals and organisations to use as part of their strategies to engage with their stakeholders. In Scotland, an increasing number of NHS Boards are using Social Media (to varying extents) as part of their communication and engagement activities.

NHS Grampian recognises the potential benefits that good use of Social Media has to offer as a business communication tool, but equally acknowledges that certain risks are associated with the use of these sites.

This policy is for departments and services within NHS Grampian who are seeking to use Social Media for the purposes of communicating:

- News and announcements
- Public education and health campaigns
- Business continuity communications

This policy covers the application process which departments and services seeking to use Social Media will be required to follow. As part of their application, departments and services will nominate members of staff who will take on responsibility for managing their Social Media profile(s).

The inappropriate use of Social Media by staff can carry significant reputational, technical and legal risks to NHS Grampian. As a result, this policy provides clear advice and guidance to those departments and services approved to use Social Media on how to use it appropriately. Applicants will be required to sign an Acceptable Use Agreement.

Those departments and services that have been approved will be given access to Social Media sites. NHS Grampian's position remains that no member of staff will have access to Social Media sites on a computer or device that is the property of NHS Grampian – unless authorisation has been granted by following the application procedure set out in this policy.

The policy does not consider or permit the wider user of electronic messaging, such as private message, chat, e-mail, sms, imessage and WhatsApp.

This policy should be read in conjunction with the guidance on personal use of Social Media.

2 What is Social Media?

Social Media is online technology that enables the sharing of information, the promotion of discussion and the establishment and development of relationships.

Information can be shared in a variety of different formats, such as text, pictures, video and audio.

Examples of popular Social Media sites include Facebook, Twitter, YouTube and LinkedIn.

Social Media sites can be accessed on a variety of devices including computers, smart phones and tablet computers.

2.1 Benefits, Challenges and Limitations

Good use of Social Media has the potential to:

- Enable messages to be issued quickly.
- Increase access to audiences and improve accessibility of communication.
- Enable the organisation to be more active in its relationships with its various partners and stakeholders.
- Offer greater scope to adjust or refocus communications quickly, where necessary.
- Improve the long-term cost effectiveness of communications.

Challenges and limitations:

- Social Media sites are not fully secure. Any content posted on to these sites may be seen by people other than the intended audience. Any content published must be considered as being public, even if privacy/security settings are set as private or a restricted audience.
- Managing reputation in a setting which is meant to encourage discussion and comments needs careful consideration.
- Social Media sites require moderation. This involves monitoring, managing and responding to any comments published by other users on a particular page or account which has been set up by an individual, department or organisation. As this requires to be undertaken on a regular basis (ideally daily) there will be time and resource implications to ensure this is done effectively.

- Social Media is not generally backed up in the same way as internally networked services – there is no guarantee that content previously published can be retrieved if lost, corrupted or compromised.

3 Scope

This policy sets out a process for the limited and authorised use of Social Media for professional purposes to allow the organisation to realise the benefits of Social Media whilst ensuring the risks are appropriately assessed and managed. This policy is specifically for departments and services wishing to use Social Media for the purposes of:

- News and announcements
- Public education and health campaigns
- Business continuity communications

The policy does not consider or permit the wider user of electronic messaging, such as private message, chat, e-mail, sms, imessage and WhatsApp. If departments or services wish to communicate using those methods they must refer to the Electronic Communications Protocol, available on the Intranet under Information Security.

This policy applies to all employees of NHS Grampian and others carrying out work for NHS Grampian such as contractors, volunteers and honorary staff.

This policy applies to those who are interested in seeking access to Social Media sites or those who have already been explicitly granted authorisation to do so. Employees who have not applied for access or who have not been granted access must not disclose information, make commitments or engage in activities on Social Media on behalf of NHS Grampian.

This policy covers the accessing of these sites (including logging in and out of Social Media account(s) set up for work purposes) using NHS Grampian computers and on other devices (such as smart phones, tablet computers) which are the property of NHS Grampian.

This policy does not cover what employees discuss, comment on or publish in their own time on their own personal Social Media account(s)/profile(s). This is covered by the guidance on personal use of Social Media.

4 Roles and Responsibilities

4.1 NHS Grampian:

It is NHS Grampian's responsibility to ensure the effective governance of this policy, namely to ensure that employees are aware of this policy and their obligations relating to the corporate use of Social Media. This will be communicated to staff through the corporate intranet, through Team Brief and staff global bulletins. Any member of staff who has queries about the contents of this policy are advised to seek advice from their supervisor/line manager in the first instance, or alternatively contact their HR contact or staff side representative.

4.2 Employees:

It is the responsibility of all employees to ensure that they have read and understood this policy, in addition to other applicable policies and professional guidelines.

Employees who have been granted access to use Social Media for business purposes are required to agree to and adhere to this policy and sign an Acceptable Conditions of Use Agreement.

Please be aware that any Social Media activity which results in harm, distress or loss of reputation to patients, staff or the organisation may be considered gross misconduct and potentially unlawful.

Any member of staff who is found to be in breach of the following may be subject to disciplinary action:

- The NHS Grampian IT Security Policies (including Electronic Messaging Protocol and the use of Internet & E-mail).
- The NHS Grampian Employee Conduct Policy.
- Codes of professional standards relevant to an employee's profession.

Only those employees who have been granted authorisation to access these sites (including Social Media account(s) set up for work purposes) should only do so when logged on to the NHS Grampian IT Network. Illegitimate use of Social Media is logged by eHealth and could be considered misconduct.

Under no circumstances should a Social Media account set up for work purposes be accessed on any device (such as smart phones, tablet computers) that is not the property of NHS Grampian, such as a device owned by the employee.

5 Appropriate Business Use of Social Media

Using Social Media in an official capacity brings with it certain expectations.

Whatever the reason for using Social Media, staff are ultimately representing themselves, their department/service and NHS Grampian whenever they publish any content or messages on to these sites.

Any content published on Social Media sites can become available to other users around the world within a matter of minutes. Many media organisations and journalists follow Social Media sites and regularly republish information from these sites.

As a result, employees are expected to conduct themselves on Social Media sites as they would in the real world. Employees should operate in a professional manner at all times – that is to be respectful, fair and honest and to demonstrate integrity at all times.

NHS Grampian's Corporate Communications reserves the right to monitor Social Media sites and request removal of certain posts and inappropriate comments/feedback (posted by staff or other users) where these breach the points covered in sections '5.1 Key Points' and '5.2 Best Practice'.

5.1 Key Points

As a general rule:

- Content published on to Social Media sites should consist of information that is already publicly available (such as on other reputable public websites) or information that is intended for public consumption.
- Social Media sites should be used for increasing awareness of matters relevant to the topic that the page/account has been set up for.
- Social Media sites should be used to communicate with the general public and/or sizeable groups within the community.
- Social Media sites should not be used to communicate with people on a one-to-one basis (unless responding to comments) and should not be used to discuss medical matters, including appointments, or provide specific medical advice or share medical opinion.

5.2 Best Practice

Any department/service/member of staff (defined as 'User') that has been granted access to use Social Media sites for business purposes will be expected to comply with the following:

Acceptable use of Social Media – Users must:

1. Remember that you are representing NHS Grampian. Make sure that all content published is of a standard that is consistent with your work and NHS Grampian's ethos, priorities and professional standards.
2. Participate online in the same way as you would in an official capacity with other media, public meetings or forums.
3. Adhere to the NHS Grampian IT Security Policies and relevant HR and confidentiality policies. You must fully comply with the professional codes of conduct that are relevant with your profession (for example those issued by The Nursing and Midwifery Council, The General Medical Council and The Health and Care Professions Council).
4. Make sure you are always seen to be acting in an honest, accurate, fair and responsible way.
5. Regularly post content, monitor your page(s)/account(s) and keep them active. Any account which has not been updated for six months will be considered to be inactive and will be subject to removal by the NHS Grampian Social Networking Steering Group.
6. Think before you publish any content (including linking to content on an external website). If you are in doubt about whether something is suitable to publish, either seek advice from your service/line manager or simply don't publish it.
7. Only use Social Media to disseminate information with the public that is already publicly available - provided it doesn't breach any of those items listed in point fourteen.
8. Manage expectations of patient/public communication – be clear that this service is there to provide general public information only and does not provide any other form of information or advice.
9. Ensure that all content published is presented in a way that is suitable for the intended audience. Content should be presented in a way that is simple and easy to understand. Ideally technical/medical jargon should not be used, but where such wording has to be used, provide a short explanation that explains the meaning of the words used. Further information on providing information for patients and public is available on the NHS Grampian Corporate Communications Intranet site under 'Writing Guide'.

10. Exercise caution when dealing with posts received from other users – both unsolicited or in response to an item published. Refer to section '7.0 Responding to comments and feedback' for more information. Seek advice from your service manager or nhsg.socialmedia@nhs.net before replying to any comment or query.
11. Comply with existing arrangements in place within NHS Grampian for people wishing to request information or provide feedback. Please refer to section '6.0 Freedom of Information (FOI) and other requests' and section '7.0 Responding to comments and feedback' for more information.
12. Keep a record of all content published on Social Media as part of an Information Governance audit trail.

Inappropriate use of Social Media - Users must:

13. Not post messages, images or recordings of patients, colleagues, contractors or members of the public without receiving formal prior written consent from those individuals.
14. Not provide medical advice in response to public or private messages received from individuals. The only suitable response in such an event is to advise those individuals to seek advice through the appropriate route (such as making an appointment to see their GP or to attend a clinic).
15. Not publish (or republish) content about the NHS, its services, facilities, staff, patients or third parties that could be considered as inappropriate, confidential, breaching copyright, offensive, defamatory, patronising, discriminatory, harassing, illegal, embarrassing, threatening or intimidating or which may incite hatred or compromise the safety of staff or patients.

In the event of any of the above being posted on to your page/account, do not delete or remove these, but contact nhsg.socialmedia@nhs.net immediately for further advice and guidance on the appropriate action to take.

16. Not access personal Social Media accounts or engage in casual browsing on Social Media (that is not work related) when on the NHS Grampian IT Network.
17. Not use Social Media for whistle blowing or to discuss work and work-related matters, issues and complaints. Any legitimate concerns should be addressed through the appropriate Board channels, for example the NHS Grampian Grievance Policy or the NHS Grampian Dealing with

Bullying and Harassment Policy.

18. Not engage in private and chat messaging with the public without first reading and adhering to the Electronic Communications Protocol, available on the IT Security Intranet site.
19. Not use apps, games or other tools provided by Social Media sites – without first seeking advice from nhsg.socialmedia@nhs.net and/or nhsg.itsecurity@nhs.net. This includes resources for the purposes of straw polls/canvassing and discussion forums.

Security – Users must:

20. Keep your account secure:
 - Screen-lock and secure your device when left unattended.
 - Log out of your Social Media account(s) when no longer using it.
 - Keep the Social Media account login details secure (for example not written on a piece of paper and left at a workstation) and ensure that they are known only by those authorised to access the account.
 - Change your password on a regular basis (ideally on a monthly basis). As ownership of page(s)/account(s) remain with the NHS Grampian Social Networking Steering Group, any change to usernames and passwords must be notified to the group immediately by e-mail to nhsg.socialmedia@nhs.net.
21. Never change the security or privacy settings of the account from that suggested by the NHS Grampian Social Networking Steering Group.
22. Be wary of any suspicious, random or unsolicited messages you receive from other Social Media users. Never click on any web links or content (photos, videos etc) included in such messages. Never reply to such messages.

Incident Reporting – Users must:

23. Alert your line/service manager in the first instance if you make a mistake or if something else has gone wrong. Be upfront and be quick with your correction, for example correcting a factual inaccuracy in an earlier post.

Any breaches of information or of this policy must be reported to: nhsg.socialmedia@nhs.net and nhsg.itsecurity@nhs.net).

5.3 Seeking advice

If you have any queries about any of the above, please contact nhsg.socialmedia@nhs.net.

6 Freedom of Information (FOI) Requests

Any department/service/member of staff that has been granted access to use Social Media sites for business purposes will be expected to comply with the following:

NHS Grampian has a legal obligation to comply with the requirements of the Freedom of Information (Scotland) Act 2002 (FOI) and the Data Protection Act 1998 under which a person or organisation is entitled to request information from a public body. NHS Grampian has established systems in place to handle requests for information and has created dedicated e-mail addresses through which requests for information can be submitted.

Accounts set up for departments and services will contain text telling people how to make an official request for information. This notice (which will be published when the page/account is first created) must not be altered and must remain on the Social Media account profile at all times. The statement may be subject to change at any time, which will be managed by Corporate Communications.

For reference, anyone requesting information through Social Media should be directed to:

Information Governance
NHS Grampian
Rosehill
House
Cornhill Road
Aberdeen
AB25 2ZG

Tel: 01224 551549

- For Freedom of Information requests, e-mail: nhsg.foi@nhs.net
- For personal information requests, e-mail: nhsg.infogovernance@nhs.net

This can be achieved through a short message advising the person to contact Information Governance direct and then provide the appropriate e-mail address.

7 Responding to Comments and Feedback

It is possible that users on Social Media sites will attempt to provide feedback about their experience of using a service provided by NHS Grampian or on other matters relating to the work of the health service. It will be the responsibility of those managing the page(s)/Social Media accounts to monitor for any feedback and to manage any response appropriately.

Members of the public are currently able to post feedback on Social Media as follows:

- On Facebook - Posting feedback in response to an item that has been officially published (page security settings should be set so that no-one but the page administrator can publish new items)
- On Twitter - Posting feedback as a Tweet with the name of the department/service and NHS Grampian included in the message (for example tagging NHS Grampian as @NHSGrampian).
- On Twitter - Sending a private message direct to the account.

Users managing the Social Media page/account on behalf of their department should consider the following:

If responding to a query would result in sensitive information being disclosed, or if the person is providing feedback on a service or making a complaint, the most appropriate action is to direct the individual to the department or service or to the Feedback Service.

Some comments may be from people expressing their views which do not require responses. Users may voice opinions that you do not agree with, however care should be taken not to be drawn into a debate.

This will be covered in more detail in training for those who are approved to use Social Media. Further information and advice is always available by contacting nhsg.socialmedia@nhs.net.

8 Application Procedure

This section outlines the process for making an application to access Social Media sites for business purposes.

8.1 Eligibility Criteria

Applications to use Social Media may be made only for the following business purposes:

- (i) News and announcements
- (ii) Public education/health campaigns
- (iii) Business continuity communications

Examples of these are available in Appendix

Two.

Applications can currently be made to use the following Social Media sites:

- Facebook
- Twitter

These are currently two of the most popular sites available. It is recognised that there are other sites in operation (such as Google Plus) and there will inevitably be new sites that will emerge over time. To take account of this, applicants will be able to specify other Social Media sites they are seeking access to in the Application Form.

The list of sites that applications can be made to use will be reviewed regularly to take account of any new sites that emerge.

Requests to access to picture and video sharing sites, such as YouTube and Flickr, will not be granted under any circumstances. This is because these types of sites present significant security threats to the integrity of the NHS Grampian IT Network. This will be reviewed annually to take account of any technological and security developments.

8.2 Application Procedure

Any individuals, teams or departments wishing to apply to use Social Media for professional purposes which fit within the scope of (i) to (iii) above must complete an Application Form and the Acceptable Conditions of Use Agreement (which are available in the Social Media section of the Corporate Communications Intranet Site) and submit these via their service manager/Director to the NHS Grampian Social Networking Steering Group at: nhsg.socialmedia@nhs.net.

Applications will be submitted to the NHS Grampian Social Networking Steering Group. IT Security have conducted a risk assessment of the use of Social Media in accordance with this policy, which considers the type of information that will be communicated, the intended audience and addresses any potential risks and issues that could emerge.

As part of the application process each member of staff who requires access will be required to sign an Acceptable Conditions of Use Agreement. This has to be completed and returned along with the application form before the application will be processed and considered.

If approval is given, the NHS Grampian Social Networking Steering Group will:

- Agree with the applicant on the title of the page/account.
- Create the page/account on Facebook/Twitter.
- Provide graphic elements to use for the account/pagebranding.
- Delegate access to the applicant (ownership of the page/account remains with the NHS Grampian Social Networking Steering Group).

Departments and services whose applications were declined will receive a response advising of the reasons for the decision and will have the right to appeal. Departments and services whose applications were unsuccessful must not set up a presence on any other Social Media site.

8.3 Evaluation

Staff responsible for monitoring and updating Social Media sites will be supplied with an evaluation report template to complete.

The evaluation report will cover the usage of the site, interaction of friends/group members, number of friends/members and examples of material that has been uploaded to the site. The evaluation should contain details of any incidents and how these were resolved.

Each Social Media site has its own measurements and tools (such as Facebook Insights) and these should be used to generate the statistics.

The evaluation report will be used to decide if the use of a social networking site has been successful and beneficial to the project.

The evaluation report should be submitted to the NHS Grampian Social Networking Steering Group at six monthly intervals from the date of approval.

If the evaluation reports are not favourable (e.g. repeated incidents, no postings, membership decreasing) the decision may be made to close the site.

8.4 Training

Successful applicants will be required to attend introductory training.

Facebook and Twitter

1 Facebook

Facebook is one of the most popular Social Media sites worldwide and has in the region of 955 million users worldwide (as of July 2012)¹. This makes it an appropriate and ideal platform to convey information to a broad audience.

Facebook provides a platform to communicate and share information, photos, videos and links with other Facebook users. Most individuals using Facebook will be registered as a user. It is not possible to create a user profile for an organisation, a department or service as this would break Facebook's terms of use.

Facebook instead offers 'Pages' which can be used to promote an organisation, brand or prominent figure (for example a politician, athlete or celebrity). Pages can be managed by one or more Facebook users.

One of the main features of Facebook pages is that they do not have a list of friends, as profiles do, but they have fans.

Facebook is currently used by a number of NHS organisations in Scotland including:

1. NHS inform
2. NHS 24
3. NHS Lothian
4. NHS Tayside
5. NHS Lanarkshire
6. NHS Fife
7. Scottish National Blood Transfusion Service

2 Twitter

Twitter allows its users to publish short text messages as well as links to websites (up to 140 characters) and has approximately 550 million users worldwide (as of April 2012)². Twitter has recently introduced a feature which allows photos/images to be included as part of a message.

Twitter is a popular and highly effective tool to help inform people about new services and developments and can be used by individuals, organisations and brands.

On Twitter, users can post updates instantly, follow and view updates from other users and send a public reply or private direct message to another Twitter user.

One of the main advantages of Twitter is that users can follow updates issued almost in real-time from people and organisations on events or developments as soon as they happen.

Twitter is currently used by a number of NHS organisations in Scotland including:

- | | |
|-----------------|-----------------------------|
| 8. NHS inform | 12. NHS Lanarkshire |
| 9. NHS 24 | 13. NHS Fife |
| 10. NHS Lothian | 14. Scottish National Blood |
| 11. NHS Tayside | Transfusion Service |

Source:

1. Facebook – Wikipedia: <http://en.wikipedia.org/wiki/Facebook>
2. Twitter – Wikipedia: <http://en.wikipedia.org/wiki/Twitter>

Examples of First Wave Applications

1) News and announcements

Boards can upload subtly different news and announcements onto Social Media than mainstream channels such as official web-sites. NHS Lothian has used Twitter to show when the minor injuries clinic might be more appropriate for some cases than Accident and Emergency. This not only informs the public but can potentially help boards to free up resources by funnelling patients to the best place.

The more informal nature of Social Media means that boards can put announcements which would not normally make the front page of an official health board web-site (such as health charity and other community events) but which foster good relations and 'social presence'. The viral nature of Social Media means that word can get around more quickly than other channels (companies call it 'guerrilla marketing').

Social Media is not the place for staff to enter into public debates. There may however be cases where Social Media conversation strings highlight straightforward inaccuracies (or even myths). A news story which aims to correct a myth can be placed into Social Media fora as part of an overall communications plan. Alternatively, there could be a 'hot seat' session where for a limited time-slot a senior NHS Grampian representative might host a question and answer session. This is safer than entering into conversation strings already initiated by members of the public (i.e. could be construed as state interference or even political opinion shaping).

2) Public education and health campaigns

Social Media can be incorporated into wider public health campaigns. 'Tweet what you eat' (healthier eating), 'quitter twitter' (give up smoking), 'helping those, helping others' (Blood Donation) are just some of the blogs/discussion fora set up by boards. The advantage of Social Media here is that the official content is mixed in with tips and self-help sent in by the public. The informal and less censorious tone can be more accessible than some poster/web-site campaigns.

3) Business continuity communications

Social Media can be used to get key messages out quickly to a wide audience during emergencies. The winter of 2010/11 in Scotland was the worst for forty years leading to the closure of public buildings and schools. Some NHS boards used Twitter micro-blogs or announcements on Facebook to inform the public about the availability of services. Traditional channels (such as bulk e-mails, telephone calls or updating front web pages) are not always an option if there is a disaster and IT systems are down. Micro-blogging could also be used to connect with employees as part of continuity plan.

Using Social Media in this way is also a good way of getting 'followers'. Most people may follow NHS tweets for the first time during bad weather but can be encouraged to maintain contact afterwards provided tweets remain relevant (e.g. for significant virus outbreaks rather than an avalanche of routine updates on services).

The health organisation can also monitor reaction and feedback contained in messages/tweets in order to gauge the effectiveness of its emergency response (e.g. customers suggesting that a road that provides access to a hospital is now open or complaints). Some boards are Twitter 'followers' of public organisations such as the Meteorological Office which enables them to aggregate and then condense lots of news-feeds relevant to their own audience.

IT Security Risk Assessment

Stakeholders – Various clinical departments, Service managers and service users of this department.

Need to Know – The information exchanged is clearly defined within the policy. News and announcements, Public education/health campaigns, Business continuity communications.

Agreed purpose – This is a business type of communication. Service users are receiving publically available information and in some case being asked to give feedback.

IT Security Risk – Sensitivity of communication – **Green**. The volume of information, per communication - **Public/Individual**. The type of organisation or service user – **Public/Patient**. The initial risk is **Medium**. With this procedure and controls in place, the risk is **Low**.

Clinical/business risk – The service cannot improve without appropriate feedback, the clinical risk of not allowing is; impact **Moderate**, likelihood **Possible** = **Medium Risk**.

Manager Assessment – The IT Security Officer has assessed the risks and believes that the risk of conducting these activities in accordance with this policy is LOW risk.

Managing expectations of Patient communication – This aspect is addressed within section '5.2 Best Practice'.

Patient consent – Not Applicable, public information.

Nominated e-mail or number & testing receipt – Not Applicable, public information.

Outline of sending procedure – Not Applicable, communication is framed within Social Media applications.

Professional and Protectively Marked Communication – Not Applicable (all Green)

Records Management and Registration – no messaging included, if required will refer to electronic messaging protocol.