



South Lincolnshire
Clinical Commissioning Group

Social Media Policy

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Name of originator/author:	Stephanie J Foster – Social Media Engagement Officer (Optum)
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1. Introduction

NHS South Lincolnshire Clinical Commissioning Groups (CCG) strongly support the use of social media as a positive communication channel to provide members of the public, GP practices and other stakeholders with information about what we do and the services we commission.

This document exists to provide guidance for all CCG staff on the use of social media and attributed digital content for personal and business use. This should be broadly understood, for the purposes of this guidance, to include Twitter and Facebook, however, the same principles can be applied to other social media and digital platforms, such as blogs, forums, and online articles. It seeks to give direction to CCG staff in the use of these tools and help them to understand the ways they can use social media to help achieve business goals.

The CCG uses social media to provide opportunities for genuine, open, honest and transparent engagement with stakeholders; giving them a chance to participate and influence decision making. These tools are used to build online communities and networks in which the CCG plays the role of facilitating peer to peer interactivity. We are keen to support and facilitate our staff to use social media to promote the work of the CCG and to encourage patient, public and stakeholder involvement in our work.

The pace and scale of change that social media has brought to society has been significant, and will continue to be.

In the NHS, the use of social media has evolved from communications teams tweeting press releases, to staff and leaders at all levels taking part in spontaneous and structured conversations across multiple platforms.

Regional and national campaigns are now expected to consider whether social media provides a way of engaging with their target audiences, while media teams care what journalists are tweeting and not just what they file. Social media, and the culture surrounding it, is changing the nature of how people work in the NHS and beyond.

The following guidelines aim to encourage good practice in the responsible use of social media when communicating on one of the CCGs official social media channels or commenting on CCG matters through the use of other channels. While acknowledging the right of staff to freedom of expression, the CCG has an obligation to protect the reputation of both individual members of staff and the CCG as a whole.

2. Purpose and aims

The purpose of this guidance is to:

- provide guidelines for those using the CCGs corporate social media accounts;
- provide advice for CCG staff using their own personal or work-related social media accounts for work purposes;
- be clear about the CCGs stance on the use of social media for professional use;
- explain how social media can be used effectively to contribute to the CCGs work in both informing and engaging with our target audiences.

The objective is to make sure that everyone connected with the CCGs can use social media in a way that protects them and the reputation of the CCGs.

The aims of this guidance is to:

- provide clarity to staff on the use of social media tools when acting independently or as a representative of the CCG and give them the confidence to engage effectively;
- ensure that the organisation's reputation is not brought into disrepute and that it is not exposed to legal risk; and
- ensure that audiences are able to distinguish official corporate CCG information from the personal opinion of staff.

3. Social media activity

Our key audiences include:

Our staff	GP practices
Patients	Community groups
Residents within the CCG boundary	Charities and voluntary organisations
NHS England and local health providers	Patient Groups
Hard to reach communities	Healthwatch Lincolnshire
Media organisations	Local authorities
MPs and councilors	Other CCGs
Residents on the periphery of our boundary who may use our services	

How the Optum Commissioning Support Communications Team and CCG staff will use the CCGs social media profiles

- The CCG will use social media platforms, such as Twitter and Facebook, to communicate clearly, quickly and in an engaging manner to people interested in our work.
- The CCGs Twitter account will be managed by the Optum Commissioning Support Communications Team. CCG staff, following agreement from their line manager and Optum Commissioning Support Communications Team, can request access to the account to tweet from events and for specific business purposes. CCG staff can also tweet about the CCG using their own professional CCG Twitter accounts.
- The CCG Facebook account will be managed and updated by the Optum Commissioning Support Communications Team. CCG staff, following agreement from their line manager and Optum Commissioning Support Communications Team, can request access to the account to post from events and for specific business purposes. CCG staff can also post about the CCG using their own professional CCG Facebook accounts. CCG staff are also encouraged to follow and 'like' the page and share posts.

Content delivered will include (but is not limited to):

- links to news releases, blog posts, videos, guidance and other approved, publicly available NHS material;
- links to relevant information produced and published elsewhere (work of other NHS organisations, patient organisations, researchers, news organisations and

others). This can include videos, blog posts, and retweets (RTs) or shares from other social media users.

- prompts for people to complete CCG or NHS surveys and consultations;
- health tips, interesting facts, quotes or observations related to our work;
- insights from employees and staff profiles;
- patient reviews and feedback
- topical questions related to our work intended to provoke discussion;
- live updates from CCG Governing Body meetings, Patient Councils and any other meetings that will inform and encourage the public and stakeholders to get involved in shaping local health care services;
- live updates from CCG and NHS events.

Evaluation

Digital media has its own analytics which help assess the reach and effectiveness of accounts and posts.

Optum Commissioning Support Communications Team will evaluate the effectiveness of our social media channels by:

- Tracking the number of people following our accounts, and the number that are engaging with the page;
- Increasing the use of social media by staff – in particular, our clinicians;
- Tracking the nature and tone of interactions with us on social media;
- Looking at the analytical patterns for engagement to drive an increase in participation with social media;
- Interrogating the analytical data for our official pages to provide the evidence base for future campaigns and communications.

By expanding our social media presence, the CCG can become an innovative, engaging and interesting point of information and discussion for the population we serve.

4. Personal use of social media

Social media is as important as any other communication channel. South Lincolnshire CCG uses Twitter and Facebook as social media communication tools to promote and distribute localised and national healthcare messages. A message published on social media, such as Twitter or Facebook, has the potential to be as widely-read as a newspaper headline.

We are aware that many CCG staff may have their own social media accounts. Whilst we acknowledge that these profiles are private we would draw your attention to the details below.

Avoid entering into discussions, on social networking sites, that concern the organisation or partner organisations, work-related issues, patients, your colleagues, or your manager. Even using your own personal social media accounts, your comments can easily be picked up by search engines, and they could appear with your name beside them.

Be secure - your social media profile might not be as secure or "private" as you think it is. That's why you **MUST** check your privacy settings.

Ensure that you do not compromise your professional code of conduct and/or conditions of your contract of employment by discussing work-related issues, patients, colleagues, managers, the organisation or partner organisations on your social media profiles.

In general, on unofficial/personal channels:

- Please do not use the CCGs name, logos or branding elements in the name, avatar/picture, or profile information of your channel;
- If you wish to make it known that you are a CCG employee, where appropriate use a disclaimer such as 'the views contained here are my personal views and do not represent the views of the CCG'.

The organisation has a responsibility to ensure that all employees feel that they are protected from bullying, harassment and discrimination. Employees are therefore reminded of the CCGs Dignity at Work Policy.

5. Using corporate social media

Staff are our best ambassadors. Many already use social media, interactive and collaborative websites and tools, both in a personal and professional capacity. Rather than try to restrict this activity, the CCG wishes to embrace it as a demonstrable element of our commitment to a culture of openness. The Optum Commissioning Support Communications Team can provide guidance and training to staff members who have been selected to engage on corporate social media channels.

We recognise that there is an increasingly blurred line between what was previously considered 'corporate social networking', which could be useful to the business, and 'social networking', which is for personal use, to an extent where it may no longer be possible, or desirable, to make that distinction. For example, there is a tendency for people to maintain just one Twitter account, which is used to post a mixture of business related and personal content.

Employees should be mindful that any behaviour that may damage the reputation of the CCG, is defamatory or brings the organisation into disrepute may result in an investigation and subsequent disciplinary sanction.

If you are unsure whether a posting on a social media platform may conflict with your employment as an employee of the CCG then you should seek advice before posting any information that may compromise your relationship with your employer.

Staff should use their own discretion and common sense when using social media tools. The following guidance gives some best practices:

- Employees are personally responsible for the content they publish on social media. Staff should be mindful that what they publish will be public for a long time. When online, staff should use the same principles and standards that they would apply to communicating in other media with people they do not know;
- Be aware that followers may be colleagues, clients, journalists or suppliers. It is also possible that people may not be who they say they are and staff should bear this in mind when participating in online activities;
- Respect copyright, fair use, data protection, defamation, libel and financial disclosure laws;
- Do not provide the CCG or another's confidential or other proprietary information on social media. Do not publish or report on conversations that are private or

internal to the CCG;

- Do not publish any patient information in accordance with the Data Protection Act (as amended by the General Data Protection Regulation) and the Health and Social Care Act 2012;
- Do not give any individual health advice, instead signpost people to official sources such as the CCG, NHS Choices or their own GP;
- Respect the audience. Do not use personal insults, obscenities, or engage in any conduct that would not be acceptable in the workplace. Staff should also show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory, such as politics and religion;
- Don't use social media in any way to attack or abuse colleagues. The same principles and guidelines of the CCGs Dignity at Work Policy also apply to online activities. This policy is available on the CCG website.
- Staff should be aware of their association with the CCG when using online social networks. If staff identify themselves, or are identifiable, as an employee of the organisation, they should ensure their profile and related content is consistent with how they wish to present themselves to colleagues and stakeholders. Staff should be aware that they may be identified as an employee by any public use of their NHSmail email address;
- Staff should refrain from entering any online social networking activity for commercial gain when using their professional account and are reminded about their obligations in the relevant CCG Conflict of Interest Policy;
- If staff are contacted by a representative of the media about posts they have made, they should contact the Optum Commissioning Support Communications Team;
- If staff have made a mistake, they should not be confrontational, but aim to be the first to correct it. Please contact the Optum Commissioning Support Communications Team and/or speak to their line manager for advice;
- Try to add value. Provide worthwhile information and perspective. The NHS brand is well respected and enhanced by its people. What staff publish may reflect on the CCGs reputation or the NHS as a whole;
- Employees should be aware that any use of social media and social media websites (whether or not accessed for work purposes) may be monitored and that formal disciplinary action may be taken if, after investigation it is found that an employee has breached the terms of the CCGs Social Media Policy. This

includes the posting of inappropriate content including comments made via social and professional networking media covering activities both inside and outside work which, as a result may bring the organisation into disrepute;

- Staff who have concerns about their position on any of the issues covered by this guidance should contact the Optum Commissioning Support Communications Team and/or speak to their line manager.

Establishing an official presence on social media

It is important that the time and effort staff spend on social media is justified by the value to the business. Social networking platforms can offer many opportunities to reach specific audiences but there are also potential pitfalls which staff must be careful to avoid.

If a member of staff wishes to establish a CCG presence on a social media platform, they must seek approval from their line manager and discuss the proposal with the Optum Commissioning Support Communications Team, who will provide advice on the types of things they will need to consider, such as: time and resources, risks and issues and how to link this activity to the overall business plan for a programme or business area.

Tone and driving conversations

The tone of our messages on social media will be helpful, complimentary, conversational, informative and positive about the CCG and our work. This will help develop the CCGs personality and provide clear information about the CCGs work.

Social media is effective because it is quick and has a huge reach but messages must be in plain English. Social media is an important way of sending quick and immediate messages to a wide audience, for example if services are affected, or if there is an immediate health concern.

The entire approach to our social media strategy can be summarised by the need to drive conversations. Social media should not just be a 'paste and post' exercise for publishing content but needs to be woven into any communication and engagement exercise.

We should consider the audience perspective which can lead to commentary and active participation in the content. For this reason opinions can sometimes be divided which is why we must play an active role in responding to feedback and correspondence submitted via our social media channels.

Retweets (RTs) or sharing of posts

Tweets that the CCG retweets (RT) or posts that are shared, do not imply endorsement on the part of the CCG. If staff choose to share posts they need to be aware that this might not be endorsed by the wider organisation.

The CCG may retweet or share news, links and personal observations that are relevant to the work of the CCG. These may be from patients, other NHS organisations, partner organisations, third sector organisations and interested individuals, such as NHS colleagues, partners, health service policy makers, local and national politicians and Department of Health personnel.

Inappropriate messages or content promoting commercial organisations products and services should not be retweeted or shared, and we must not show favouritism to political parties and/or politicians.

Following other social media users

The CCGs decision to follow a particular social media user does not imply endorsement of any kind. The CCG follows accounts on social media we believe are relevant to our work. This could include following the social media accounts of companies and other commercial enterprises (and/or their employees) who comment on CCG related issues.

@replies and direct messages received via social media channels

The Optum Commissioning Support Communications Team will read all @replies and direct messages and will respond to them as appropriate following consultation with the respective CCG officer.

Complaints: The Optum Commissioning Support Communications Team will advise members of the public that the CCG is not able to manage complaints via social media and will request that the individual sends details of their complaint to the CCG complaints team whose contact details are on the CCG website..

Dealing with prolific and/or consistently negative users

The CCG reserves the right to not respond should a user be overly prolific, consistently negative, or use abusive or offensive language. Please contact the Optum Commissioning Support Communications Team for advice.

6. Best practice tips

Be professional

Be professional at all times - anything you post in your role as a CCG employee reflects on the organisation.

Watch your language

Avoid using abbreviations and jargon.

Be committed

If you do not have the time or resources to check in on social media sites at least a few minutes each day and to post fresh content several times a week, you may want to reconsider using social media at this time.

Be responsive

One of the great benefits of social media is the ability to share information almost instantly with a global audience.

This timeliness is also one of the expectations of that audience. Be prepared to move quickly in response to new developments, announcements, or emergencies with relevant information.

A short amount of accurate information delivered at the time of need can sometimes be more valuable than a full report delivered well after the issue has passed.

If you don't know the answer to someone's question, let them know you've forwarded their request to the relevant person and will get back to them shortly.

Don't over post

Unless you are posting live from an event, try and limit your posts to a maximum of three a day and ensure they are spread out over the course of several hours.

Think before you post

Remember that anything you share within social media, even within a closed network, is not private. It can and will be shared, stored and spread globally.

Don't post anything online you wouldn't feel comfortable seeing on the CCG homepage.

Check your facts

If you're unsure of something's accuracy, do not post it until you have verified the information. Disinformation can have a greater negative impact than delayed information.

Be informative

Social media is not (only) about sharing your news and success, it's about sharing information that is of interest to your readers and viewers.

Don't just talk about your CCG - share the best information you find from trusted sources outside the CCG. This will increase the value of your social media presence.

Accept and monitor comments

A social media site without comments isn't very social. Be prepared to accept and respond to comments.

Understand that not all comments will be positive, and respond to negative comments professionally and by providing any additional information that may help resolve the issue.

Separate personal from professional

Balancing your professional and personal social media presences can be tricky. Keep these two presences as separate as possible by keeping content about your personal opinions on your personal page.

Ask for help

If you are unsure about anything please contact the Optum Commissioning Support Communications Team for advice and support.

You can find further information and advice online at <http://www.nhsemployers.org/your-workforce/need-to-know/social-media-and-the-nhs/social-media-guidelines>

The Nurse and Midwifery Council also have some social media guidance available at <https://www.nmc.org.uk/standards/guidance/social-media-guidance/>