



Hertfordshire Partnership  
University NHS Foundation Trust



# Social Media Policy

## Building community dialogue

Policy for corporate use and how staff  
and others can join in

<b>Version:</b>	1
<b>Executive Lead:</b>	Executive Director – Strategy and Commercial Development
<b>Lead Author:</b>	Interim Head of Marketing and Communications
<b>Approved Date:</b>	24 <sup>th</sup> June 2013
<b>Approved By:</b>	Informatics Management and Technology Meeting
<b>Ratified Date:</b>	1 <sup>st</sup> July 2013
<b>Ratified By:</b>	Policy Panel
<b>Issue Date:</b>	1 <sup>st</sup> July 2013
<b>Review Date:</b>	1 <sup>st</sup> July 2016

**Target Audience:**  
This Policy must be understood by all staff working for HPFT

**P1 - Version Control History:**

Below notes the current and previous Version details-

Version	Date of Issue	Author	Status	Comment
V1	1 <sup>st</sup> July 2013	Interim Head of Marketing and Communications	Current	New Policy

**P2 - Relevant Standards:**

**a) NHS Constitution**

**b) Equality and RESPECT:** The Trust operates a policy of fairness and RESPECT in relation to the treatment and care of service users and carers; and support for staff.

**P3 - The 2012 Policy Management System and the Policy Format:**

- **Policy Template** is the essential format for most Policies. It contains all that staff need to know to carry out their duties in the area covered by the Policy.
- **Operational Policies Template** provides the format to describe our services ,how they work and who can access them
- **Care Pathways Template** is at the moment in draft and only for the use of the Pathways Team as they are adapting the design on a working basis.

**Symbols used in Full Policies:**

**RULE** =internally agreed, that this is a rule & must be done the way described

**STANDARD** = a national standard which we must comply with, so must be followed

**Managers** must bring all relevant policies to the attention of their staff, where possible, viewing and discussing the contents so that the team is aware of what they need to do.

**Individual staff/students/learners** are responsible for implementing the requirements appropriate to their role, through reading the Policy and demonstrating to their manager that they understand the key points.

All Trust Policies will change to these formats as Policies are reviewed every 3 years, or when national Policy or legislation or other change prompts a review. All expired & superseded documents are retained & archived and are accessible through the Compliance and Risk Facilitator [Policies@hertspartsft.nhs.uk](mailto:Policies@hertspartsft.nhs.uk)

All current Policies can be found on the Trust Policy Website via the Green Button or <http://trustspace/InformationCentre/TrustPolicies/default.aspx>

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## **1. Summary**

HPFT aims to make best use of modern technology and to use social media alongside other communications activity. This will help the organisation improve its communication with its staff, service users, carers, local communities and with partner organisations in the public, private and voluntary sectors. Social media approaches will ensure we meet people where **they** are, as well as improving mechanisms for engaging and consulting with a range of stakeholders, thereby helping the Trust become more transparent and candid in its actions. HPFT also wants to be in a position to support staff to use social media opportunities for professional networking and development.

## **2. Purpose**

The purpose of this policy is to ensure the organisation and its representatives are using social media in a safe and professional manner. It applies to all HPFT staff and representatives, including volunteers, agency workers and secondees.

## **3. Definitions**

### **STANDARD**

NHS staff are bound by the values, rights and responsibilities set out in the NHS Constitution. The principles covering the use of social media by NHS staff and organisations in both an official and personal capacity are the same as those that apply for any other media.

Social media is a public forum and the same considerations apply as when speaking in public or writing something for publication either officially or outside of work. Sometimes boundaries between professional and personal lives can become more blurred when using social media, so it is important to be particularly careful. Staff are free to use social media in their own time but need to be mindful of their duties not to disclose official information without authority and not to take part in any political or public activity that might be seen to compromise HPFT providing an impartial service.

## **4. Duties and Responsibilities**

### **RULE**

HPFT's social media output is the responsibility of the Head of Marketing and Communications.

- Videos are uploaded to the HPFT Youtube site by the Marketing and Communication team.
- HPFT's Twitter feed is tweeted by the Marketing and Communications Team. Requests for tweets and draft content may be submitted to them by any member of HPFT staff but is a particular responsibility for members of the Executive Team, the Senior Management Team and members of the Marketing and Communications team.
- HPFT's Facebook page and LinkedIn page will be updated by the Marketing and Communications Team.

## 5. Use of social media in HPFT

- a. 50% of the UK population now uses Facebook and use of Twitter is expanding rapidly. Increasingly, the government and other public, private and voluntary sector organisations are finding that social media has real value. Staff groups are seen to engage in discussions and practice-sharing.
- b. Social media offers a great opportunity for engaging in discussion with a range of stakeholders. It is also a good way of sharing praise received for good services, as well as providing an additional opportunity for service users, carers and staff to feedback on their experiences of the Trust in a constructive way. However, it is not appropriate for clinical or personal discussions with individual service users or carers. Stories and discussions on Twitter can be very quickly picked up by bloggers and then news websites.
- c. At the same time, it helps public sector organisations like HPFT explain what they do and how and why they do it, thus adding a further level of transparency and accountability and allowing the public to input into decisions, raise queries and for replies to be broadcast widely.
- d. Being present in the conversation will allow HPFT to be a catalyst for creating online communities interested in what we are trying to deliver. This means we will be able to ensure that advice given is sensible, relevant and timely.
- e. We will not try to respond to every question asked of us on a Twitter stream. In some cases it won't be appropriate for reasons of impartiality or legality. It may be that some information is properly provided by other organisations.
- f. **YouTube** – HPFT's YouTube channel content is restricted to good quality videos, under 15 minutes in length with clear and engaging audio. Staff and friends of HPFT who have an idea for a video that would add value to this site should email [comms@hertspartsft.nhs.uk](mailto:comms@hertspartsft.nhs.uk)
- g. **Twitter** – HPFT's Twitter feed's purpose is to build a sense of community in support of HPFT and to manage the Trust's corporate brand and messages online. It does this by being used to
  - Showcase our services
  - Demonstrate that HPFT staff are leading thinkers in mental health and learning disability care
  - Advertise our conferences and other events
  - Trail our press releases and blogs
  - Celebrate our internal and external awards
  - Provide a public channel for Executive team members, the Managing Directors and /or the Service Line Leads to thank staff for outstanding work
  - Share presentations
  - Publicise News from HPFT, our members and stakeholders magazine
  - Raise awareness of key facts on incidence and performance
  - Engage stakeholders in discussions
  - Engage with and support partners in the community

- h. **Facebook** – HPFT’s Facebook page content and purpose will be similar to the HPFT Twitter feed. Content is uploaded to and monitored regularly, for ‘likes’ and comments. Suitable content includes:
- News items, and news about events and activities
  - Content that provides a direct link back to HPFT’s external website
  - Information about new developments at HPFT
  - Comments on wider mental health or learning disability policy issues
  - Partner information such as Mind or Mind in Herts, Mencap etc
  - Programmes or commentary which might be useful to Facebook audiences
  - Advertising events and providing opportunity for booking onto Trust events/training activities.

To submit information to be included on the HPFT Facebook page staff should email: [comms@hertspartsft.nhs.uk](mailto:comms@hertspartsft.nhs.uk) Not all events or activity will be posted and the communications team will have the final decision on the content and timing of postings.

There may be opportunities in the future for staff to create their own discussion ‘groups’ via Facebook. Any such requests should be discussed first with the Marketing and Communications team.

- i. **LinkedIn** – HPFT’s LinkedIn page is to raise awareness of HPFT and its business and to provide a recruitment route for key members of staff.
- j. HPFT’s Twitter presence was piloted at the regional learning disabilities conference in May 2013. This heralded a soft launch of the Trust’s social media accounts, with a more high profile approach being considered later.
- k. HPFT will use hashtags (#) when providing live coverage of events (live-tweeting) and to distinguish important topics which may already have a hashtag established.
- l. Re-tweeting content from other Twitter users will be considered on a case by case basis on relevant topics but will not respond to such requests from profit-making organisations. We may consider re-tweeting interesting content that shows up in our own Twitter stream: e.g. research findings, relevant networking events and celebrations, key campaigns promoted by third sector organisations representing service users and carers.
- m. Our social media content will be reduced during election Purdah, the period leading up to political elections. This is in line with Cabinet Office guidance to public services in their dealings with the press and broadcasters at these times. We will let our followers know the reason for our reduced online activity by announcing the start and end dates of those periods on our social media accounts.
- n. HPFT’s social media presence will be promoted once it is established through
- a story in the weekly bulletin to all staff
  - links from our website homepage
  - finding and following /linking with relevant others on the various platforms
  - adding the links to email signatures
- o. In due course, further promotion will be considered, including:
- adding the links to the ‘notes to editors’ section in all press releases
  - an email to key stakeholders

- presentations to teams
  - a link in the News from HPFT ezine and other publications
- p. New starters will be informed of this policy as part of the induction process.

## 6. Personal use of social media by HPFT staff

- a. Increasingly, HPFT staff are realising benefits of social media in their personal life, although only those specifically permitted by IT can access social media sites on Trust PCs.
- b. Anyone who clearly identifies their association with HPFT and/or discusses their work, is expected to behave appropriately, in line with HPFT values and policies, their individual responsibility as a Trust employee, and any relevant professional codes of conduct for health professionals. Employees who breach the Trust's Social Media Policy may be subject to disciplinary action. It is worth noting that a number of NHS employers have already done this and employees have even been dismissed for inappropriate use of a social website or other media.
- c. Staff who are professionally registered are also bound by their professional body's code of conduct.
- d. It is important to ensure compliance with relevant Trust protocols regarding confidentiality and protection of personal information when using social media. This policy sets out the principles which Trust staff are advised to follow when using social media outside of working time. The Trust's IT policy deals with the use of web-related systems whilst at work. The intention of this policy is not to stop Trust staff from conducting legitimate activities on the internet, nor to stifle constructive criticism, but serves to highlight those areas in which problems can arise for both individual staff members and the Trust.
- e. The Code of Conduct attached at Appendix 1 offers some tips for staff using social media in their own time. The following RULE (f – q) gives clear guidance to staff on how they can support the organisation and protect themselves when using social media.

### **RULE**

- f. It's your own personal choice whether or not you choose to participate in any kind of social media activity in your own time – the views and opinions that you express are your own and you should make this clear. However, as a HPFT employee you should be aware that any information which you post about the Trust cannot be kept entirely separate from your working life and it is important that the HPFT is not brought into disrepute.
- g. What you say openly online can be accessed around the world within seconds, it might be shared or re-published elsewhere (online or in print) and it will continue to be available for all to see in the future. You must be willing to take personal responsibility for anything that you say online.
- h. By displaying a @HPFT.nhs.uk or nhs.uk email address, by joining NHS or Trust-related networks on social media sites or by making reference to the Trust as your employer, whatever you say has a direct impact on the reputations of HPFT and

the NHS as a whole. It is important to bear this in mind when choosing what to say and how to say it online.

- i. If a member of staff is contacted by the media about posts they have made on a social networking site that relate to the Trust they must talk to their line manager and the Head of Marketing and Communication before responding.
- j. Any online social media activities associated with work for the Trust should be discussed and approved in advance by a line manager.
- k. **Respecting others when using social media sites** - Social media sites allow photographs, videos and comments to be shared with thousands of other users. However, it may not be appropriate to share work-related information in this way. For example, there may be expectations that photographs taken at a private Trust event will not appear publicly on the internet, both from those present and perhaps those not at the event.
- l. Staff should be considerate to their colleagues in such circumstances and must not post information when they have been asked not to. Staff should ensure they comply with the Equality Act 2010 by treating people from the protected groups appropriately in their social media activity. They should also remove information about a colleague if that colleague asks them to do so. These rules are also followed on the corporate pages managed by the Marketing and Communications team. If you are at an event it will be made clear if photographs are being used for external purposes.
- m. **Blogging** - Bloggers may use their personal blogs to discuss their Trust work in ways that benefit the Trust. This policy is not intended to restrict this, as long as confidential information is not revealed and the Trust or its employees / other staff are not brought into disrepute. If being used for work purposes, then the normal standards of conduct / behaviour apply. Anyone in doubt about what might be confidential should consult their line manager.
- n. Staff members who already have (or who want to start) a personal blog or website which indicates in any way that they work at the Trust should discuss any potential conflicts of interest with their line manager and / or seek advice from the Head of Marketing and Communication, who will take account of the Trust policy on standards of business conduct. Being offered payment to produce a blog for a third party this could constitute a conflict of interest and must be discussed with their line manager.
- o. If a blog in any way indicates that the author works for the Trust, it should include a simple and visible disclaimer such as - "These are my personal views and not those of the Trust". The Trust's logo must not be used on personal web pages.
- p. Personal blogs and websites must not be used to attack or abuse colleagues or service users. Staff members should respect the privacy and feelings of others. Remember also that if they break the law on a blog (for example by posting something defamatory or infringing copyright), they will be personally responsible.
- q. **Engagement with Service Users and actions to take in an emergency** - The aim of social media is not just to engage with third sector, commissioners or other external audiences but also our staff and service users and carers. However, if there is any indication that a service user is in distress or needing advice, those monitoring the social media will refer this on to the Single Point of Access team if the service user is identifiable in any way. The Single Point of Access (SPA) team is aware of this possible action. All HPFT social media accounts signpost people to the SPA number, which is routed through to the crisis teams outside normal

SPA operational hours. The message is: "Need help urgently? See your GP or call 0300 777 0707". The advice of service users has been sought in developing this policy.

## 7. Risk assessment and mitigating actions

Risk	Mitigation
Criticism arising from an inability to meet the demands of Twitter users to join conversations/answer enquiries, due to resource and clearance issues	Reduce by managing expectations with clear, published Twitter policy; use holding replies where answer will need research; respond to 'themes' not individuals (only if swamped)
Criticism arising from perceptions that our use of online media is out of keeping with the ethos of the platforms (e.g. too formal/ corporate)	Reduce by sourcing varied content. Accept that there will be some criticism regardless.
Criticism of jumping on the bandwagon/waste of public money/lack of return on investment/pointless content	Reduce by evaluating against objectives and adhering to content principles below Develop a planned strategy built on evidence-based effective use of social media
Inappropriate content being published in error, such as: <ul style="list-style-type: none"> <li>• News releases under embargo</li> <li>• Information about commissioner whereabouts</li> <li>• Protectively marked, commercially or politically sensitive information</li> </ul>	Establish 'light' but effective procedural controls and guidelines for Twitter users; require clearance of all tweets along established press office protocols.
Technical security of the Twitter / Facebook / LinkedIn accounts and potential for hacking and vandalism of content	Change passwords frequently using strong passwords; avoid using unknown 3 <sup>rd</sup> party tools that require the account password
Lack of availability due to Twitter/ Facebook /LinkedIn being over capacity	Accept (affects all users of a platform, occurs rarely and is brief).
Changes to the Twitter/ Facebook / LinkedIn platforms (to add or change features, or to charge users for accessing the service)	Review business case for continuing to use the services when any such changes are made;
Squatters/spoofers on Twitter/ Facebook/ LinkedIn	Reduce by registering alternative names. Accept residual risk and monitor for this occurring. Report spoof accounts to Twitter/ Facebook /LinkedIn for suspension.
HPFT staff unaware of content and unable to access Twitter/ Facebook/LinkedIn on desk tops.	Comms have machines where access is possible. Content will be summarised and added to HPFT News as 'Tweets of the day' item.
HPFT staff commenting on HPFT posts though their own personal Twitter / Facebook and LinkedIn accounts.	Code of Conduct attached to this policy as Appendix 1 offers guidance to support what staff say and do from their own accounts.

A service user in crisis uses Twitter/ Facebook / LinkedIn to get in contact with HPFT and seek urgent help	All our social media account profiles will state: "If you need help urgently please call 0300 777 0707"
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## 8. Training/Awareness

No formal training in the use of social media is available in HPFT but staff can link with the Marketing and Communications team for advice. Opportunities may arise to support staff to develop effective and safe use of social media as needs are identified and interest builds. One example is a social media workshop at the 2013 Social Work Conference.

## 9. Embedding a culture of Equality & RESPECT

The Trust promotes fairness and RESPECT in relation to the treatment, care and support of service users, carers and staff. This policy extends that approach to use of social media by HPFT and its representatives.

RESPECT means ensuring that the particular needs of 'protected groups' are upheld at all times. This includes the needs of people based on their age, disability, ethnicity, gender, gender reassignment status, relationship status, religion or belief, sexual orientation and in some instances, pregnancy and maternity.

Working in this way builds a culture where service users can flourish and be fully involved and where staff and carers receive appropriate support. Where discrimination, inappropriate behaviour or some other barrier occurs, the Trust expects the full cooperation of staff in addressing and recording these issues through appropriate Trust processes.

**RULE:** HPFT's social media presence must therefore take full account of needs relating to all protected groups listed above. Where staff need further information regarding these groups, they should speak to their manager or a member of the Trust Inclusion and Engagement team. Where staff, service users and carers experience barriers, the Trust is required to take appropriate remedial action.

## 10. Process for monitoring compliance with this document

The Marketing and Communications team will gather evaluation data using a range of methods. Initially this will involve:

- Daily online monitoring
- Web analytics and click-throughs from URLs in our posts (using bit.ly in tweets).
- The followers/following data in our Twitter account / number of 'likes' on Facebook / number of links on LinkedIn
- Alert services – tweetbeep.com to track mentions of HPFT business
- The policy will be reviewed every three years. Review of the policy is the responsibility of the Information Governance Group.

In due course, this may be expanded to include the use of third party tools to measure, for example, re-tweeting (Retweet Radar, Twist), online reputation (Monitter, Twitter Grader), impact and influence (Twinfluence, Twittersheep), unfollowers (Quitter).

Links with complaints, compliments and customer feedback mechanisms may be put in place in the future as HPFT further develops its use of social media

**Key Performance Indicators**

<b>Action:</b>	<b>Lead</b>	<b>Method</b>	<b>Frequency</b>	<b>Report to:</b>
Review of traffic on our social media sites	Head of Marketing and Communications	Report on volume and tone	Monitoring several times a day	IGC
Check compliance with the rules in this policy	Head of Marketing and Communications	Review HPFT mentions	Report annually	and  Policy Panel

**11. Version Control**

**STANDARD**

Version	Date of Issue	Author	Status	Comment
1		Interim Head of Marketing and Communications		

**12. Archiving Arrangements**

**STANDARD:** All policy documents when no longer in use must be retained for a period of 10 years from the date the document is superseded as set out in the Trust Business and Corporate (Non-Health) Records Retention Schedule available on the Trust Intranet

A database of archived policies is kept as an electronic archive administered by the Compliance and Risk Facilitator. This archive is held on a central server and copies of these archived documents can be obtained from the Compliance and Risk Facilitator on request.

**13. Associated Documents**

**STANDARD**

This policy links with the Email, Internet and Intranet policy.

**14. Supporting References**

**STANDARD**

- Social media guidance for civil servants (Crown copyright 2012)
- Using Twitter strategy – Information Commissioner’s Office (January 2012)
- NHS Information Governance: Information Risk Management Guidance: Social Interaction – Good Practice (February 2012)
- Increasing staff engagement with social media – NHS Employers March 2013

**15. Comments and Feedback – List people/ groups involved in developing the Policy.**

**STANDARD**

Executive Director Strategy and Commercial Development	Customer Inclusion and Engagement Team Manager
Company Secretary	Group of service users/carers
Associate Director Information Management and Technology	Interim Change Manager
Information Governance Officer	HR Business Partners

## APPENDIX 1

### Code of conduct – using social media in your work

We want Hertfordshire Partnership University NHS Foundation Trust (HPFT) Directors, employees and members to feel confident when using social media – and to achieve meaningful involvement through these activities. We have developed this Code of Conduct to help us all understand good practice for online participation, and to make it clear what standards are expected of anyone who works for HPFT. These guidelines are in addition to any professional standards that govern your specific area of work, and in addition to HPFT policies.

#### Rules for online participation

You should follow these five guiding principles for any social media activities that are part of your work or associated with the Trust:

- **Be respectful**

Set the tone for online conversations by being polite, open and respectful. Use familiar language and speak as an individual. Be cordial, honest and professional at all times. Make sure that you respect people's confidentiality – do not disclose non-public information or the personal information of others.

- **Be credible and consistent**

Be accurate, fair, thorough and transparent. Encourage constructive criticism and deliberation. Make sure that what you say online is consistent with your other communications.

- **Be honest about who you are**

Remember that you are an ambassador for our organisation. It's important that any accounts or profiles you set up on behalf of HPFT are clearly and easily identifiable as corporate profiles. Be clear about your own personal role and the service that you represent.

- **Be responsive**

Make an effort to share what you know. Offer insights where appropriate and put people in touch with someone who can help if you can't. Respond to questions and comments in a timely manner (make sure you meet user expectations for the type of social media that you're using).

- **Be confident**

Don't be scared of participating. Follow these rules and seek further guidance if you need it. If you're about to publish something that makes you even the slightest bit uncomfortable, pause to think about it. Feel confident in what you say before you say it – and say it as clearly as you can.

#### User content rules

If you're moderating any kind of online space that is managed by HPFT, we have some basic rules about what kind of content is acceptable. We already use the five guiding principles above for things like discussion forums, online consultations and user comments. We agree to publish all contributions from our users (whether or not we agree with what the user is saying), providing that they don't break these rules.

## Personal use of social media

Some tips for HPFT staff using social media in their own time:

- Add a disclaimer to your blog or social media profile to make it clearer that your personal accounts are personal – for example: “These views are my own and do not necessarily represent the views of HPFT”.
- Think about what capacity you’re speaking in, particularly if you are commenting about HPFT. Make sure you avoid misunderstandings about whether you’re speaking as part of your work or not. Seek further advice if you’re unsure.
- Check your online privacy settings so that you understand who can see the information you publish and who can view your personal information.
- Respect privacy and confidentiality – make sure you don’t publish any information that should be kept private.
- Stay safe – don’t give out personal details such as your address or phone number.
- Make sure that you’re familiar with HPFT’s policy about *Personal use of electronic communications in the workplace*
- Avoid revealing confidential information about service users, staff, or HPFT
- Avoid activities on the internet which might bring the Trust into disrepute
- Never attack or abuse colleagues in any way
- Refrain from using social media to build or pursue relationships with service users, even if they are no longer in your care.
- Use the proper channels (not social media) for raising and escalating concerns ie whistleblowing.
- Ensure your comments and posts are not defamatory, derogatory or offensive
- It is important that individual service user queries or complaints are not handled using social media. If you find someone has posted something of this nature please inform the Head of Marketing and Communication immediately and refrain from entering into an online ‘conversation’. Responding to queries or complaints online could lead to a breach in service user confidentiality or something libellous being published.
- All information and messages you publish on the internet need to be ones that you would be willing to say or defend in public.

## Our vision

**‘to be the leading provider of mental health and specialist learning disability services in the country’**

To be a leading provider, we must offer high quality care with excellent treatment outcomes, within a safe environment which meets the needs of service users.

Our vision is underpinned by eight goals which inform our entire strategy.

- To deliver high quality integrated health and social care services in accordance with recovery principles
- To be the provider of choice for service users, carers, the community and commissioners
- To work in partnership with the community to promote the wellbeing of others, whilst making a positive contribution to the environment
- To be the employer of choice where staff are highly valued, well supported and rewarded
- To create a dynamic and flexible working environment where staff are motivated and committed to providing high quality care
- To embed a learning culture where staff develop their full potential and deliver excellent care
- To ensure a sustainable future through income growth and efficient use of resources
- To be an innovative and learning organisation that embraces new and modern approaches to health and social care

