

29 January 2018

Freedom of Information Request – Ref: FOI 269-1718

Thank you for your recent Freedom of Information request about social media. Please find the Trust's response below.

1. Does your organisation have a Facebook Page(s)? If yes, what is/are the url(s) and when were they set up?
Yes, www.facebook.com/2getherNHS. The page was set up in 2010.
2. Does your organisation advertise or spend any money on Facebook? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since 2004?
2016-2017 - £900 plus VAT.
2017-2018 - £275 plus VAT.
3. Does your organisation have a Twitter Account? If yes, what is/are the url(s) and when were they set up?
Yes, www.twitter.com/2getherTrust. Set up in 2010.
4. Does your organisation advertise or spend any money on Twitter? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since 2006?
No
5. Does your organisation use Google G-Suite services (Google services) or does your organisation rely on google for any services (such as email hosting)? If yes, what are the services, when were they agreed and how much did they cost?
No
6. Does your organisation advertise or spend any money on Google? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since the payments first began?
No
7. Is there an official policy for the use of organisational Facebook or Twitter Accounts (ie how to post, what to use it for and when to delete or preserve records)? If there is a policy (or policies) please may I be provided with them?
Yes, our social media policy is attached.

Should you have any queries in relation to our response in this letter, please do not hesitate to contact me. If you are unhappy with the response you have received in relation to your request and wish to ask us to review our response, you should write to:-

Anna Hilditch
Assistant Trust Secretary,
2gether NHS Foundation Trust
Rikenel
Montpellier
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Tel: 01452 894165
E-mail: anna.hilditch@nhs.net

If you are not content with the outcome of any review, you may apply directly to the Information Commissioner's Office (ICO) for further advice/guidance. Generally, the ICO will not consider your case unless you have exhausted your enquiries with the Trust which should include considering the use of the Trust's formal complaints procedure. The ICO can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Yours sincerely,

Lisa Evans

LISA EVANS
Information Governance Officer
2gether NHS Foundation Trust

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or write to: OPSI, 102 Petty France, London SW1H 9AJ.

Using Social Media Policy

Version:	12
Consultation:	Director of Organisational Development Trust Secretary Assistant Director, HR IT Systems Manager JNCC
Ratified by:	Director of Engagement and Integration
Date ratified:	18 October 2017
Name of originator/author:	Head of Communications
Date issued:	October 2017
Review date:	October 2019
Audience	Trust employees, Board members, Governors, volunteers and contractors

Using Social Media Policy

1 POLICY STATEMENT

- 1.1 Together NHS Foundation Trust recognises that many individuals who have an association with the Trust engage in social networking and the use of social media.
- 1.2 Social media is widely used because it enhances communication and brings groups and individuals with common interests together in a virtual way. The Trust actively encourages social media use and provides its own social media channels, including Facebook, Twitter, Instagram and LinkedIn. Our staff are encouraged to engage with our social media channels, and share our content appropriately with their networks in order to more widely share our news, tackle stigma and promote access to services.
- 1.3 There are many benefits to social media, but where an individual identifies their association with the Trust or their role in the work of the Trust, it is important to ensure that all personal social media activity is consistent with the Trust's values and policies and to all relevant standards of behaviour and professional codes of conduct which may apply.

2 INTRODUCTION AND PURPOSE

- 2.1 The purpose of this policy is to set out the standards of behaviour expected of all those who claim an association with the Trust when using social media. The policy is not meant to deter people from using social media but to help protect social media users and prevent them from bringing the NHS and/or the Trust into disrepute either inadvertently or intentionally. The policy also specifies the potential consequences of any action which contravenes these principles.
- 2.2 For the purposes of this policy, social media is defined as interactive online technology tools that allow individuals to exchange and share information and resources including pictures instantly via the internet. This includes, but is not limited to: chat; online blogs; personal websites; discussion, comment and message forums; email groups; instant messaging; social networking sites, and file sharing sites, including video. This list is not intended to be exhaustive as this is a constantly evolving area. Social media users should follow this policy in relation to any social media that they use.
- 2.3 This policy does not prevent or seek to prevent anyone from raising legitimate concerns about patient or public safety. However, where this is the intention of the communication, the Trust's Whistleblowing Policy should be used.

3. SCOPE

- 3.1 This policy applies to all persons carrying out an activity at the request of or through agreement with the Trust, whether this is business, employment or another activity, and regardless of whether the activity is paid or unpaid. This includes Non-Executive Directors, Governors, employees, (including those on fixed term contracts, or “Bank’ staff), Experts by Experience, contractors and volunteers. For the purpose of this policy the term “social media users” will be used to describe those above.
- 3.2 The scope of the policy includes use of both Trust resources and personal resources to access social media sites. The policy also applies to the use of social media outside of working hours. Employees, in particular, are expected to maintain a professional approach to work, patients and colleagues at all times. Other people to whom this policy applies should be mindful of their behaviour and responsibilities at all times when using social media.
- 3.3 All existing and related organisational policies apply when using social media within the scope of this policy e.g. IT Acceptable Use Policy, Disciplinary Policy, Grievance Policy, Whistleblowing Policy, the Data Protection Act and relevant professional codes of conduct for healthcare professionals.

4 CONTEXT

- 4.1 Social media is the term commonly used for websites and other electronic media which allow people to interact with each other in some way by sharing information, opinions, knowledge and interest. Also known as social networking, it involves the building of online communities and networks encouraging participation and engagement.
- 4.2 The Trust recognises that in recent years there has been a significant rise in the use of social media, and recognises the benefits that the use of such media can bring to everyone. The Trust supports the responsible use of social media by all social media users, alongside safeguards to ensure the confidentiality and safety of service users, employees and Trust business.

5 DUTIES

5.1 Head of Communications

The Head of Communications is responsible for the relevance, accuracy, content and proper release of this policy.

5.2 Managers

Managers are responsible for ensuring this policy is adhered to within their own area, taking appropriate action when required, and ensuring that those within their area of responsibility, including volunteers, are made aware of the policy and their responsibilities.

5.3 **Employees**

All employees are responsible for complying with this policy and any associated guidance that may be produced. Employees including managers are responsible for ensuring that any communication on social media that comes to their attention and contravenes this policy is brought to the attention of their manager, the Head of Communications or a member of the Human Resources Department.

If an employee is concerned about another employee's online behaviour then they should report this to their line manager along with any supporting evidence, so that any appropriate action can be considered in accordance with Trust policy.

If employees believe that information has been inadvertently posted, they may wish to bring this to the attention of the individual who has posted the information.

5.4 **Volunteers**

Although not employed by the Trust, Volunteers are expected to abide by the Trust's requirements and standards of behaviours whilst carrying out voluntary duties on behalf of the Trust.

5.5 **Training Manager**

As part of Trust induction training for all Trust employees, the Training Manager has a responsibility for ensuring that this policy is cascaded as appropriate at the start of employment.

5.6 **Human Resources**

Human Resources will be responsible for providing advice as to the application of this policy when set against other Trust policies and for any employee contractual requirements

5.7 **All Others**

Other people as described in the scope of this policy are responsible for complying with this policy and any associated guidance that may be produced.

6 **DEFINITIONS**

6.1 **Disrepute** means generating unwelcome publicity about the Trust or the NHS or otherwise having an actual or potentially adverse effect on the reputation of the Trust or the NHS

6.2 **Social media users** includes Executive and Non-Executive Directors, Governors, employees (including those on fixed term contracts and Bank staff), contractors, Experts by Experience and volunteers

6.3 **Social Networking** is the term commonly used for websites which allow people to interact with each other by sharing information, opinions, knowledge and interests.

Examples of social networking sites include Facebook and Twitter (social networking), LinkedIn (professional networking) YouTube (video sharing), Flickr (image sharing), Instagram, Wikipedia (wiki) and del.icio.us (bookmarking). This is not an exhaustive list.

- 6.4 **Instant messaging** is a way of communicating from one user to another and differs from email and some other social networking services in that the conversations happen in real-time. Some examples of instant messaging tools include Whatsapp, Snapchat and Messenger. This is not an exhaustive list.
- 6.5 **Blogging** is using a public website to write an online diary (known as a blog) sharing thoughts and opinions on various subjects. The word blog is derived from the phrase (we)b log. Some examples of blogging websites include Twitter.com (a microblog site), Blogging.com and Blogger.com. This is not an exhaustive list.
- 6.6 **Vlogging** is using a public website to broadcast films and recordings sharing skills, thoughts and experiences on various subjects. The term means 'video blogging'. The most popular sites for vlogging include Vimeo and Youtube.

7 OWNERSHIP AND CONSULTATION

- 7.1 The Head of Communications is the author and owner of this policy.

8 RATIFICATION

- 8.1 This policy is ratified by the Executive Committee and the Joint Negotiating and Consultative Committee.

9 RELEASE DETAILS

- 9.1 This policy will be published on the Trust's intranet.

10 REVIEW

- 10.1 This policy will be reviewed every 3 years, subject to changes in legislation, advances in technology or the production of national/regional guidance.

11 PROCESS FOR MONITORING COMPLIANCE

- 11.1 Managers will monitor compliance within their work area, and take appropriate action – seeking advice from the Communications Team and Human Resources as appropriate - when infringements of this policy are brought to their attention.

12 TRAINING

- 12.1 Further guidance and training will be provided by the Trust as required or as requested.

13 THE VALUE OF SOCIAL MEDIA

13.1 Social media forms an integral part of the lives of many people. Staff, service users, carers, volunteers and others may rely on various forms of social media to keep in touch, maintain their health and wellbeing, social relationships, professional development and career development. The Trust welcomes the use of social media for all these purposes and wishes to engage with social media users on several levels:

- To tackle stigma and promote mental health advice and support
- To aid recruitment
- To support learning and development opportunities
- To maximise the quality of contact with service users and carers
- Provide a range of information to those who have contact with the Trust and its services 24 hours a day, making information available when the recipient needs it
- Improve efficiencies and effectiveness of working time, reducing unnecessary travel

13.2 To maximise the use of social media and its beneficial impact on staff and our services, the Trust welcomes feedback on how its use could be improved. Comments can be posted via the Trust's Facebook site, Twitter account etc.

However the Trust is also clear that the use of social media can be fraught with unintended consequences and open to misuse by those who deliberately wish to do so. The Trust therefore wishes to support staff who are social media users by providing clear guidance on "Do's", "Don'ts", expectations and Trust values to safeguard and enhance everyone's experience of using or accessing social media. Many of these may seem to be common sense, however, it is often easy to lose sight of the wider ramifications of "posts" when interacting with like-minded social media users.

14 POLICY PRINCIPLES

14.1 Individuals should make sure that when using social media to talk about the Trust, colleagues and in general, they do so by using sound judgement, and common sense. Every communication should be consistent with the Trust's core values. Social media users should be respectful and honest, and should avoid comments which are derogatory about:

- an employee of the Trust;
- the actions someone has taken on behalf of the Trust;
- individuals and organisations associated with the Trust or their activity on behalf of the Trust

14.2 Everything we say online is in the public domain and messages intended for friends and family can be circulated wider than the intended audience. Staff should always consider whether people or organisations other than the intended recipient would consider their communication to be appropriate.

14.3 Individuals must:

- act in the best interests of service users and carers
- demonstrate respect and maintain the dignity of colleagues and other organisations that they have contact with in the course of their work-related duties. Derogatory or negative social media comments about colleagues, even if made outside of work time, may be in breach of the Trust Dignity at Work Policy
- respect and maintain the confidentiality of service users and carers
- not post any sensitive or confidential information about a service user, carer or colleague, such as information about their health or personal life
- keep high standards of personal and ethical conduct
- avoid making spurious or malicious comments about individuals or organisations
- Identify their relationship with the Trust when making comments about the Trust
- not use an alias when discussing the Trust, which can mislead people about their connection with the organisation
- behave with honesty and integrity and make sure that their behaviour does not damage the public's confidence in them, their profession or professional colleagues, the Trust or other organisations with which the Trust works
- clearly state that all opinions are their own
- abide by all relevant professional codes of conduct
- notify the Trust Secretary, their line manager, HR Manager or any senior manager of any information that they see in a public forum that raises concerns because it appears to contain sensitive or confidential information
- ensure that they don't breach any Trust policies
- not reveal any information pertaining to Trust systems, processes, internal structures or Intellectual property unless explicitly authorised to do so by a relevant manager and within their professional role.

14.4 Staff are responsible for their own online communications and should ensure that posts are accurate and factual. Posts should not be misleading or potentially damaging.

14.5 Other organisations and individuals may see posts shared online. Staff should make sure that they do not disclose sensitive or commercially confidential information.

14.6 Staff should not appear to speak on behalf of the Trust unless authorised to do so in an official capacity. This is separate to staff sharing information or comment about the Trust which is encouraged within the parameters of this policy.

14.7 Staff should acknowledge any copyright and credit the authors of any other material such as text or images, that they may wish to use. Where possible, they should

include a link to the source.

- 14.8 Work time should not be used for non-work or social activity. Individuals may use their own devices such as mobile phones to access social media sites during break times while at work. They may also use social media during work time where there is a clear link with their role or they are assisting with spreading news and information shared on the Trust's social media channels.
- 14.9 Any work based disagreements, issues or concerns should be dealt with by following the appropriate Trust procedure and policy. Information should not be shared or discussed on social media and contact from service users on social media should be politely discouraged.

15 BREACHES OF THIS POLICY

- 15.1 Any breach of this policy by an employee may be considered to be a disciplinary matter and any allegations that are upheld may constitute gross misconduct. In addition where individuals are named and allegations made on social networking media, criminal and civil action could follow. For example where a statement is considered defamatory, social media users could be prosecuted under defamation laws such as the Defamation Act 2013. This policy does not replace the current legal framework, and adherence to this policy will not constitute a defence in the case of any action brought by a complainant against a social media user.
- 15.2 Where other individuals are found to have breached this policy, the Trust reserves the right to take any appropriate action to limit or reduce further contact with the Trust.

16 ASSOCIATED DOCUMENTATION

Policy on Promoting Dignity at Work

Grievance Policy

Disciplinary Policy

Use of Internet and Email Policy

Whistleblowing/Freedom to Speak Up Policy