



Social Media Policy



Contents

1.	INTRODUCTION	3
2.	SCOPE	3
3.	RESPONSIBILITIES	3
4.	focus AND SOCIAL MEDIA	4
5.	THE USE OF SOCIAL MEDIA IN A PERSONAL CAPACITY	4
6.	THE USE OF SOCIAL MEDIA FOR BUSINESS PURPOSES	5
7.	INFORMATION, CONFIDENTIALITY AND SECURITY	6
8.	PROFESSIONAL ORGANISATIONS	7
9.	RAISING CONCERNS	7
10.	POLICY REVIEW	7

1. INTRODUCTION

- 1.1 focus recognises that many staff enjoy using social media within their personal lives and, more recently, as a means of networking or sharing knowledge in their working lives. This policy aims to ensure that all staff enjoy the benefits of social media, whilst understanding their obligations and responsibilities to focus, colleagues, service users and carers.
- 1.2 This policy also provides guidance for staff on actions they should take, should they become aware of the inappropriate use of social media by service users or carers, particularly where this may adversely impact on other service users, carers, staff or focus.
- 1.3 This policy does not form part of any staff members' contract of employment and it may be amended at any time.

2. SCOPE

- 2.1 This policy applies to all focus employees, contractors and agency staff (collectively referred to as 'staff' in this policy).
- 2.2 This policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Wikipedia, and all other social networking sites, internet postings and blogs.
- 2.3 It applies to the use of social media for business purposes as well as personal use that may affect our business in any way.
- 2.4 Breach of this policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether our equipment or facilities are used for the purpose of committing the breach. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.
- 2.5 Staff may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

3. RESPONSIBILITIES

- 3.1 The Head of Business and Governance has overall responsibility for the effective operation of this policy, but has delegated day-to-day responsibility for its operation to Line Managers. Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks also lies with the Head of the Business and Governance.

- 3.2 Supervisors are responsible for ensuring that staff are aware of their obligations and responsibilities under this policy and to take timely and appropriate actions to deal with any breaches of this policy.
- 3.3 All staff are responsible for observing their obligations and responsibilities under this policy, ensuring they do not breach the requirements set out herein.

4. focus AND SOCIAL MEDIA

- 4.1 focus recognises that there are significant benefits for both individuals and organisations from the use of social media. However, the inappropriate or ill-considered use of social media also has the potential to damage the reputation of individuals and focus. There are examples of organisations where, through social media, unauthorised disclosure of business information has taken place and breaches in confidentiality have occurred. Social media have also been used as a means of carrying out bullying and harassment. focus employees must therefore be aware that there are a number of legal and ethical implications associated with the use of social media.
- 4.2 Any breaches of this policy and guidance will be taken extremely seriously by focus and may result in the individual being subject to internal disciplinary proceedings (including dismissal) and / or potential legal action.
- 4.3 In addition, staff should be aware that focus may monitor the use of social networking sites to ensure that any use by staff complies with this policy. At all times staff should be very clear which 'hat' they are wearing when using social media – their personal hat or their business hat.

5. THE USE OF SOCIAL MEDIA IN A PERSONAL CAPACITY

- 5.1 The use of focus' systems and resources, including internal and external social media, is for business use only. However, it is acknowledged that reasonable personal use is allowed during an employee's own time (e.g. unpaid lunch break). Should any concerns be raised over the potential misuse / abuse of this facility then these will be taken forwards in line with focus' Disciplinary Policy.
- 5.2 This section provides guidance on the use of social media tools by focus staff in a personal capacity, for example, a personal profile on Facebook or use of Twitter (this list is not exhaustive):
 - Staff must be aware of their association with focus when using social media. If they identify themselves as staff of focus then they must ensure that their profile and any related content is consistent with how they are required to present themselves to colleagues, partners, service users and carers, or how they are required to represent focus or their profession;

- Staff should not record any content that is potentially detrimental to the organisation or its reputation and may bring it into disrepute;
 - Staff who do not directly identify themselves as staff of focus should be aware that any content they post on social media websites could still be construed as relevant to their employment. For example, staff must not write or report on conversations, meetings or matters that are meant to be private, confidential or internal to focus;
 - Staff who post discriminatory language, personal insults, obscenity, and disclosure of confidential information will be considered to have breached focus' Code of Conduct and brought focus into disrepute. These actions could be construed as misconduct/gross-misconduct;
 - Staff need to be aware that comments posted about colleagues could be taken into account should bullying and harassment allegations be made by an aggrieved colleague(s). These actions could be construed as misconduct / gross misconduct;
 - Staff must not, under any circumstances, cite or reference service users or carers (details or identities). To do so would breach the law on confidentiality, their contract of employment and professional Code of Practice. Such actions could be construed as misconduct / gross misconduct; and
 - Staff must not disclose confidential information that damages the business interests of focus. Such action could be construed as misconduct / gross misconduct.
- 5.3 focus will not accept liability for any actions arising from staff personal use of social media sites. Use of any social media can expose staff to risk. Message boards and blogs are both considered to be public media and material posted on those resources is subject to the same laws as those of print. Staff should therefore avoid making controversial comments about any organisation, individual, product or service that they would not feel comfortable making in a published magazine.

6. THE USE OF SOCIAL MEDIA FOR BUSINESS PURPOSES

- 6.1 focus has its own official social media accounts, including Facebook, Twitter and blog. There are additional Facebook and Twitter accounts for Services4Me. The content of these accounts will be managed through the Central Business Unit Digital Information Team. Any member of staff wishing to post business information via these accounts must seek approval to the content from their supervisor before submitting to the CBUCP. Where employees wish to post comments in relation to the official content then the guidance detailed in Section 5 also applies.

- 6.2 Staff may wish to use social media tools within the course of carrying out their contractual duties. However, focus does have a formal system of communication and staff should always use this as the first route for the dissemination of any business information. Staff should not set up Face book or other social network accounts for work related purposes. Where the use of social media is being considered, this should be discussed with the CBUCP.
- 6.3 Only CBUCP staff will be granted authority to access other social networks for justified work purposes. Such staff must comply with the instructions set out in Section 5 of this policy. CBUCP staff will be able to post information on behalf of focus and carry out other specific activities on social network sites in line with the focus Communications Strategy.
- 6.4 Where a member of staff wishes to use a professional website or social media tool during working hours to share best practice or seek advice and feedback from other colleagues as part of their role, they must gain the appropriate authorisation from their supervisor before proceeding.
- 6.5 Some social media sites enable its contributors to write recommendations or make referrals for friends/associates. If a member of staff does this in a professional capacity it could be construed that focus endorses such a recommendation or referral. This exposes focus to liabilities for damages, should a third party suffer a detriment as a result of the recommendation / referral. Consequently recommendations or referrals can only be made through the CBUCP.
- 6.6 Supervisors and staff who are unsure of which sites, forums or tools are acceptable for use in a professional capacity should speak to a Head of Service or Head of Information & Security for advice.
- 6.7 When using social media for business purposes staff should respect their audience, acknowledging that they are acting as an ambassador for focus, and that their comments and statements reflect directly on focus' reputation. Staff should refer to the focus Communication Classification and Standards document when developing any form of communication via social media.

7. INFORMATION, CONFIDENTIALITY AND SECURITY

- 7.1 Staff are reminded that they are bound by the relevant sections of their Contract of Employment relating to confidentiality and the focus Confidentiality Policy. Information that staff come into contact with whilst conducting their duties, and/or at their place of work, is covered by the Data Protection Act 2018/General Data Protection (GDPR) and should only be used for the specific purpose(s) for which it was collected. Furthermore, staff are reminded that this data must not be disclosed to other parties without the consent of the individual whom it is about, unless there is legislation or overriding legitimate reason to share the information.

8. PROFESSIONAL ORGANISATIONS

- 8.1 Many professional organisations, such as HCPC, NMC etc. provide their members with advice and guidance on using social media to avoid inadvertently bringing their profession into disrepute. Staff who require professional registration are recommended to read their respective organisations guidance relating to social media and their professional registration and professional organisation's Code of Conduct (or similar).

9. RAISING CONCERNS

- 9.1 Should staff have concerns over other staff members' inappropriate use of social media in connection to focus' business, service user and carer confidentiality, or other staff, they should raise these concerns with their supervisor or a Head of Service in the first instance.
- 9.2 Staff should be aware that they have a responsibility to raise concerns should they see, or become aware of, service users, carers or members of the public using social media to comment on the services provided by focus and/or individual service users or carers. Such concerns should be discussed with supervisors who will refer to the Head of Business and Governance who can take legal advice to see if focus needs to take action to have the comments removed, particularly should they breach the privacy, dignity and/or confidentiality of patients and staff or be deemed contrary to the business interests or adversely affect the reputation of focus. Such actions may include contacting the person directly to get the comments, photos etc. removed, notifying the social media provider (Facebook, Twitter etc.) regarding the comments that have been posted on their site and /or involving the Police to consider criminal implications.

10. POLICY REVIEW

- 10.1 This policy and guidance will be reviewed as part of a rolling programme of review over the next three years or earlier should new legislation be made relevant to social media use.
- 10.2 Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the Head of Business and Governance.