

Social media and media engagement policy

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1.2	July 2023	Joy Hale (JH)	Approval by Executive Team. Additions to points 3.4 – 3.6 to clarify individual's responsibilities. New section: 4.0 Using social media during a system response to an incident. This section has been added to reflect the ICB's responsibilities as a Category 1 responder.

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1.0 Introduction

- 1.1 This policy provides guidance for ICB employees on the use of social media and engaging with local, national and regional media as well as trade publications. For the purposes of this policy, social media should be understood to include blogs, message boards, chat rooms, electronic newsletters, online forums and social networking sites including, but not limited to, Facebook, Twitter, Instagram, YouTube, Flickr, LinkedIn, Snapchat, TikTok and WhatsApp, plus other sites and services that permit users to share information with others online. It also includes advice and guidance on taking photographs or making films of colleagues, patients or the public.
- 1.2 Social media can be a powerful tool to support the ICBs work in communicating and engaging with partners, stakeholders and the wider public, as well as a useful mechanism for recruitment. However, if used inappropriately, social media could have a very negative effect on the ICB reputation.
- 1.3 The communications and engagement team is responsible for managing all direct communication with the media on behalf of the ICB. At the same time it is important that every member of staff, whether or not they work in a communications role, has a broad understanding of media relations and has an awareness of this policy.
- 1.4 We will be mindful of our values when handling media enquiries, including the drive to be open and transparent. At the same time, there will be occasions when it is appropriate to restrict the information we pass onto the media and the engagement we have with them. Those decisions will be made by the lead for communications and engagement together with the chief of staff and accountable officer/chief executive.
- 1.5 Our focus is on local media outlets; we will be less likely to actively engage with national media, given that it is residents and stakeholders of Hertfordshire and west Essex to whom we are accountable.
- 1.6 The principles set out in this policy apply to the professional use of social media on behalf of Herts and West Essex ICB as well as employee's personal use of social media when referencing or being identified as affiliated with the ICB.
- 1.7 This policy should be read in conjunction with the HBLICT email and internet policy.
- 1.8 All information will be held in accordance with the General Data Protection Regulation (GDPR), Data Protection Act 2018, the Human Rights Act 1998 and the common law duty of confidentiality.



1.9 Purpose

1.9.1 The purpose of this policy is to:

- (a) to ensure staff are aware of their responsibilities in relation to social media and the effect that social media can have on the ICB's reputation and working practices.
- (b) to give guidance to staff on how to best represent the organisation online, and the positive and effective way social media can help to promote the organisation's priorities

1.9.2 Effective use of the media is important and helps HWEICB achieve its objectives, as a key channel of communication to the public. Working with the media also helps maintain the good reputation of the ICB and the wider NHS, and provides a valuable opportunity to respond accurately, and in a timely fashion, to questions and controversies raised and reported by the media.

1.9.3 Local papers, television, radio and social media platforms help inform the public about the services HWEICB commissions, and also helps promote campaigns and key messages whilst maintaining effective and accurate communication with our audiences.

1.10 Scope

1.10.1 This policy applies to all ICB staff members, including the Board and Practice Representatives, involved in the ICB's policy-making processes, whether permanent, temporary or contracted-in (either as an individual or through a third party supplier). This would also include staff members of other organisations working in a shared or joint capacity.



1.11 Definitions

1.11.1 The following definitions apply in the context of this policy:

Term	Definition
Blogs	Personal website journals
Online forums	Instant messaging and chat websites
Social networking sites	For example Facebook, Twitter, LinkedIn etc.
Media	The media is a combination of various means of communication such as; radio, television newspapers, magazines and the internet, including social media platforms such as Twitter and Facebook

2.0 Roles and Responsibilities

2.1 The following definitions apply in the context of this policy:

Role	Responsibilities
Information Governance Forum	For sign off of policy and procedure
Chief Executive – Accountable Officer	
Chief of Staff	As lead for Governance and Communications and Engagement
Deputy Chief of Staff, Comms and Engagement (corporate)	Organisational lead for communication and application of the policy
Line managers	To ensure staff are aware of the policy, its principles and adherence of the policy
All staff	To follow the policy

2.2 Implementation

2.2.1 This policy will be made available via the HWE ICB intranet and HR intranet. All staff will need to be aware of this policy.

2.2.2 There is no associated training with this policy.



2.3 Monitoring

- 2.3.1 The communications and engagement team will regularly monitor social media and the media in their role.
- 2.3.2 Members of ICB staff are welcome to flag concerns of social media use of themselves or others.

3.0 Content – social media

- 3.1 Employees need to know and adhere to all relevant ICB policies when using social media; for example the email and internet policy and bullying and harassment policy. They should also be mindful of the ICB's disciplinary policy and procedure, which prohibits any actions which bring the organisation into serious disrepute.
- 3.2 Employees should be aware of the effect their actions may have on their own reputation as well as the ICB's reputation. The information that employees post or publish online can be accessed around the world within seconds and is not easy to delete or withdraw once published. This also applies to 'liking', replying or 'retweeting' others' posts.
- 3.3 Employees should be aware that the ICB may observe content and information made available by employees through social media. Employees should use their best judgement and only post material that is neither inappropriate nor harmful to the reputation of the ICB, its employees, members or the wider NHS.
- 3.4 Employees who use personal social media accounts and are communicating about something that could be perceived to have a connection to the work they do or subjects associated with the ICB must display a disclaimer such as this: *"My postings on this site reflect my personal views and don't necessarily represent the positions, strategies or opinions of Hertfordshire and West Essex ICB."*
- 3.5 Although not an exclusive list, some specific examples of prohibited social media conduct include:
- criticising or arguing with colleagues online where there is reference to the ICB, or that could be categorised as bullying or harassment
 - making defamatory comments about individuals (whether employees, patients or organisations) and using personal insults or obscenities
 - making comments which are contrary to the organisational values of the ICB
 - posting images that are inappropriate or linking to inappropriate content, using either text, imagery or video material, including images of the workplace and NHS logos



- engaging in any conduct that would not be acceptable in the workplace.
- 3.6 You should also show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory, such as politics and religion.
- 3.7 Employees must not publish, post or release any information that is considered confidential or not for public knowledge. Such unauthorised disclosure of confidential information includes:
- revealing information owned by the ICB;
 - giving away confidential information about an individual (such as a colleague or patient), or organisation;
 - discussing the organisation's internal workings (such as particular working relations with organisations or colleagues, or future business plans that have not yet been communicated to the public);
 - the posting of photos that contain visible screens in the background which may contain sensitive information about individuals etc.
- 3.8 Social media networks, blogs and other types of online content often generate press and media attention or legal questions. Employees should refer these inquiries to the ICB communications team.
- 3.9 If employees encounter a situation while using social media that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner and seek the advice of a supervisor or the communications team.
- 3.10 Employees should get appropriate permission before referring to or posting images of current or former employees, local practices, patients or the public. Additionally, employees should get appropriate permission to use a third party's copyrights, copyrighted material, trademarks, service marks or other intellectual property. If unsure, do not publish.
- 3.11 Social media use should not interfere with employees' day to day work and responsibilities. The use of social media networks or personal blogging of online content is permitted within reason, but please refer to the email and internet policy for further advice.
- 3.12 Internet usage is monitored in accordance with the email and internet policy and any excessive and/or inappropriate usage will be investigated. This may result in access to the service being withdrawn and disciplinary action taken.
- 3.13 It is highly recommended that employees keep ICB related social media accounts separate from personal accounts where possible. Further guidance on how to do that is in Appendix 1.



- 3.14 Personal online activity that violates the ICB's policies could result in disciplinary action.
- 3.15 If employees publish content via personal social media accounts that involves work, colleagues or subjects associated with the ICB, a disclaimer should be used in your bio for your account, such as this: "The postings on this site are my own and do not represent Hertfordshire and West Essex ICB's position, strategies or policies." However, the use of a disclaimer does not shield an employee from disciplinary action if the opinion or information posted is judged to have brought the organisation into disrepute.
- 3.16 Defamatory statements about the ICB or its partners will be treated as a disciplinary offence and handled in accordance with the ICB's disciplinary policy.
- 3.17 The meanings of defamation are all related to the effect that the communication has upon its subject by way of the effect it has upon society or the community generally; it can be considered defamation in the following cases:
- It is a discredit to the person
 - It causes the regard in which the subject is held by others to be lowered
 - It causes the person to be shunned or avoided
 - It causes the person to be the subject of hatred, ridicule or contempt.
- 3.18 All access (business and personal) to social networking systems using ICB equipment is logged and stored electronically for forensic investigation purposes.
- 3.19 ICB staff who are members of a professional body are advised to use the appropriate professional body's guidance when setting up and using social media, as referenced in Appendix 1.

4.0 Using social media during a system response to an incident

- 4.1 The ICB 'likes' and 'follows' the social media output of other [Category 1 responders](#), (such as the police, other NHS bodies, local councils, fire and rescue etc.) as well as formal and informal community groups, so that as part of our regular social media work, we will become aware of incidents and any statements made by these organisations. During an incident we will follow any relevant online updates (e.g. by monitoring a given hashtag) so as to be aware of the public reporting of events as they unfold, and public sentiment
- 4.2 The process of warning and informing the public and stakeholders during an incident needs to be undertaken regularly and relatively frequently. Any information shared must be from an agreed and reliable source, co-ordinated and consistent



with statements from the other bodies involved, e.g. NHS England, the police, the county council, national government or the Fire and Rescue service. The communications team will ensure social media posts carry agreed, brief key messages, linking to a single web page that holds useful up to date information for the public. That site might be run by the ICB or by an appropriate partner organisation.

- 4.3 Senior ICB staff and representatives with personal or professional social media accounts should be aware that their roles will lead some people to assume that they have additional insight into an incident, or that they know “what is really going on”. Their social media posts during an incident may attract more interest than usual. Staff who do want to share agreed key messages and information in the event of an incident should retweet, like, or share posts from the ICB or ICS accounts with either no comment or only a brief, calm comment.
- 4.4 As referenced in 4.2, there will be a single landing page for all information relating to the incident, set up either by the ICB or a partner organisation. To ensure consistency, all staff, including senior staff, should only link to that page.

5.0 Content - media

5.1 Receiving media enquiries

All media enquiries must be handled by a member of the communications and engagement team. Neither staff nor board members should respond directly to media enquiries; rather if contacted directly, they should pass queries on to the communications and engagement team – either by giving our contact details or passing on a message to the team to call the journalist. You can reach the team by emailing hweicbenh.communications@nhs.net during office hours, or by referring urgent out-of-hours enquiries to the organisation’s on-call executive. The on-call executive has the mobile out-of-hours number for the on-call member of the communications and engagement team.

- 5.2 We expect all staff or board members contacted by a journalist to be polite and helpful, but not to enter into dialogue with the media without the knowledge of the communications team. Journalists will expect to be dealing with the communications team so won’t be surprised if you decline to give any further information.

- 5.3 The team will then work with the appropriate person in the ICB to provide a clear, jargon-free response to the enquiry. All media statements need to be signed off by a member of the executive team – with a strong preference for the individual who is closest to the topic.



- 5.4 Where a situation requires it, we may occasionally arrange for an appropriate person from the ICB to speak directly to a journalist on the telephone, to provide background information.
- 5.5 **Interviews with the media**
We will offer interviews with journalists and accept invitations where appropriate. For broadcast media we will generally prefer pre-recorded interviews, rather than live. Decisions around interviews will be taken by the associate director for communications and engagement, in conjunction with the chief executive.
- 5.6 As a organisation we always try to provide a clinical member of staff or a senior leader to speak on behalf of the organisation. Occasionally it may be more appropriate for the chief executive or another member of the executive team to speak on behalf of the ICB.
- 5.7 The communications and engagement team will liaise closely with journalists and producers to ascertain the likely line of questioning and obtain background information.
- 5.8 **Media training**
Clinical leads, locality GP chairs, the chief executive, directors and other senior leaders who may be called on to speak to the media receive media training. This training will be refreshed periodically.
- 5.9 Additional media training on specific topics or issues will be arranged if needed.
- 5.10 The communications and engagement team will pull together and provide: lines to take, Q&As, advice and support before and during media interviews as necessary.
- 5.11 **Working proactively with the media**
It is important that local people know about the services that we commission and about any plans we have to change services and why. The media can be a very useful way of getting news and messages out to local people. They can also help build up our profile and enhance our reputation.
- 5.12 Staff working on an initiative that may be of interest should make contact with the communications team, who will be pleased to work with colleagues to promote it where appropriate.
- 5.13 At the same time, the communications team will source good stories from teams and work with journalists to gain coverage as much positive coverage as we can.



5.14 **Photographs and filming**

Photographs of people taken at our events or on other occasions can help illustrate our work effectively to internal and external audiences.

5.15 Please note: photographs should only be taken with the subject's permission. This can be obtained in one of three ways:

- A specific written consent form (Appendix 3) must be completed and signed by the person being photographed, or by the parent/guardian of anyone under 18
- A photography opt in/opt out section can be added to a signing in or registration sheet, and can be brought to the attention of everyone attending on arrival.
- The chair can ask attendees if they mind being photographed and the photographer will need to respect those who have opted out.

5.17 People must be made aware that photographs, once taken, may be used by the ICB in internal or external publications.

5.18 Where the media have been invited to film or photograph patients at an event, a representative of the ICB will always be present to ensure that individuals' wishes are upheld.

Appendix 1

Staff guidance on setting up and using social media in accordance with this policy

Background

The Hertfordshire and West Essex ICB (HWEICB) communications team manages our corporate use of social media, with a particular focus on Twitter and Facebook. We would like to encourage staff and clinical leads to also use these social media platforms. This guidance note outlines an approach to this activity.

Purpose of social media involvement

The ICB is increasing its engagement with social media for a number of reasons:

- to raise the profile of the ICB amongst the local population, increasing awareness of the role of the ICB in planning, organising and monitoring local health services



- to pass useful information to the public about health services and health messaging generally and to encourage the sharing of this information amongst targeted groups
- to relate urgent or emergency messages relating to the availability of health services or to support business continuity
- to extend knowledge and understanding of ICB objectives
- to broaden and deepen our conversation with local people and other stakeholders around services and service change - including eliciting and using feedback from patients, and as part of consultation exercises
- to extend our influence
- to assist with recruitment
- to assist in reputation management.

Social media is used to amplify our messages and help us have conversations with a wide audience, including those who tend not to engage with us routinely, such as those in the younger age group, as well as high-profile public figures and representative bodies.

Extending our use of Twitter and Facebook is our current focus but the communications and engagement teams will also continue to make use of other social media platforms, such as YouTube and Instagram.

Our approach to social media

The communications team runs the corporate HWE ICB/ICS Twitter account and Facebook account as well as an Instagram profile. In addition, any staff and clinical leads who wish to can establish individual professional accounts to support our presence on social media, increasing our spheres of influence and generating further opportunities for engagement. Before doing so, we would ask that individuals approach the communications team for advice and assistance.

Staff individual accounts will differ from the corporate account, as they will be more personal and dynamic, reflecting the interests and views of the individual, whilst supporting ICB objectives. Staff will add colour to our online presence, but all content is expected to support our ICB corporate key messages.

Guidance

- Users profile to include the words 'views are my own' or similar.(Please note that this does not mean you can, or should, post or like anything you want. Users are still covered by this policy)
- Staff running accounts that are primarily dealing with NHS, health or ICB issues, can generate interest and be appropriate to a dynamic and human communication method, Users may also post content that is more related to themselves as individuals.



- Users can express their own views about policy issues in general, subject to restrictions - see below.
- Content will be: respectful; in line with our NHS values; non-party political; and not contain anything which would bring the ICB or the NHS into disrepute. When expressing opinions about particularly sensitive issues, Users are asked to liaise with colleagues, in particular members of the communications team, for further guidance.
- Users are encouraged to use images and videos for which they have consent to use as relevant and as appropriate
- Users are encouraged to reference our ICB Twitter or our Facebook account as appropriate
- Users will be expected to ensure that time spent on social media activity is proportionate and fits in with the other demands of their roles. When necessary, this will be discussed with managers.

Following and re-tweeting

- Twitter users are encouraged to re-tweet content from the ICB profile as appropriate
- Facebook users are encouraged to 'like' and comment on ICB posts.
- Users are encouraged to follow - and re-tweet – stakeholder and partner posts which are appropriate, relevant and will not bring the organisation into disrepute. Users can also choose their own accounts to follow, subject to the restrictions as above. If a user is uncertain about the appropriateness of following a particular account, then seek advice from the communications team.

Topics

Users are invited to be chatty in their posts, rather than corporate or bureaucratic. Examples of possible content in individual Twitter accounts:

- news about a new public event
- reporting from a ICB or partner event
- comment on and link to article in national or trade media
- comment on recent national or regional announcements
- good news from the users team
- messages about public health issues and campaigns
- messages about particular health conditions, such as diabetes
- comments about personal issues - e.g. participating in a charity event; weekend activities and hobbies - bearing in mind the restrictions as above.
- observation about use of a particular health service - in a measured and respectful way



- requests for views - bearing in mind that this needs to be tailored to a particular objective and reason for asking.

Safeguarding

During the course of your work you may have cause to engage in online conversations with, and the promotion of, engagement opportunities with children, young people and adults at risk. The use of social media introduces a range of potential safeguarding risks to these groups. (Note: when engaging you should only engage for work purposes through the ICB official channels and not personal social media channels).

Most children, young people and adults use the internet positively, but sometimes they, and others, may behave in ways that pose a risk. Potential risks can include, but are not limited to:

- Online bullying
- Grooming, exploitation or stalking
- Exposure to inappropriate material or hateful language
- The vulnerable person giving away personal details, which can be used to locate them, harass them or steal their identity
- Coercion into illegal activity, such as distributing illegal content or hate crime
- Indoctrination into ideations and encouraged into terrorist activities
- Encouraging violent behaviour, self-harm or risk taking
- People's wellbeing not being promoted, as their views, wishes, feelings and beliefs are not taken into account.

Mitigating the Risk

The use of social media by an NHS organisation and its staff can expose both the organisation and the member of staff to unexpected information risks or liabilities, even where these social media sites are not accessed directly from work.

There are a range of potential risks and impact consequences that the ICB and its staff should be aware of:

- Unauthorised disclosure of business information and potential confidentiality breach. Once loaded to a social media platform, organisational information enters the public domain and may be processed, stored and re-used anywhere. Information published online is almost impossible to remove and can remain in the public domain indefinitely. Consequently, organisational control can be lost and



reputational damage can occur.

- Malicious attack associated with identity theft. Most sites encourage users to create a personal profile. People often place a large amount of personal information on social media platforms, including photographs, details about their nationality, ethnic origin, religion/faith, addresses, and date of birth, telephone contact numbers, and interests.
- Legal liabilities from defamatory postings by staff. When a person registers with a website they typically have to indicate their acceptance of the site's terms and conditions. These can be several pages long and contain difficult to read and understand legal jargon. Such terms and conditions may give the site 'ownership' and 'third party disclosure' rights over content placed on the site and could create possible liabilities for organisations that allow their employees to use them.
- Reputational damage. Ill-considered or unjustified comments may adversely affect public and professional opinion toward an individual, their employer or another organisation, contractor, service provider or business partner.
- Staff intimidation or harassment. In extreme cases a negative reaction to a social media post could lead to anxiety, distress and personal safety issues.

To help prevent incidents that could lead to reputational, legal or financial damage to the organisation and / or individual(s), it is important that potential risks are managed by adopting a consistent approach. The main defence against threats associated with the use of social media is user awareness.

Steps you can take to promote safety online include:

- Don't target/or engage with children who are likely to be under the minimum requirement age for the social networking service that you are promoting. This is usually 13 years but can vary by platform so check the T&Cs of that site.
- Don't accept 'friend' requests from anyone you suspect to be underage.
- Avoid collecting, and don't ask users to divulge any personal details, including home and email addresses, school information, home or mobile numbers.
- You should not use any information in an attempt to locate and or meet a child, young person or vulnerable adult, that is not required for your job.



- The Sexual Offences Act (2003) combat increasing sexual approaches to access children and young people on-line. The Act 2003 created an offence of meeting a child following sexual grooming. This makes it a crime to befriend a child on the Internet or by other social media means and to arrange to meet or intend to meet the child or young person with the intention of abusing them.
- Be careful how you use images of children, young people or adults - photographs and videos can be used to identify them to people who wish to groom them for abuse.
- Consider using models, stock photography or illustrations.
- If a child, young person or adult at risk is named, do not use their image.
- If an image is used, do not name the child, young person or adult at-risk.
- Where necessary obtain parents'/carers/guardians or Lasting Power of Attorney's written consent to film, or use photographs on web sites.
- Ensure that any messages, photos, videos or information comply with existing policies.
- Promote safe and responsible use of social media use to your audience online and consider providing links to safety and support organisations on your profile. Remind people to protect their privacy.
- Data Protection considerations - when you are collecting personal information about users, always follow the requirements set out in the Data Protection Act 2018. Collecting personal data should be done via alternative means, e.g. by signposting to a form on the website.

Safeguarding Yourself

In addition to the behaviours outlined above if you are using corporate or personal social media accounts for work related activity, you should also:

- Ensure that your privacy settings are set up so that personal information you may not want to share is not available to members of the public.
- Have a neutral picture of yourself as your profile image.



- Only use your work profile and contact details (email or telephone) for your work related activity. They should not be used on a personal account.
- If you are not sure, do not proceed without advice and support.
- Do not engage in intimate or sexual conversation or share intimate, compromising, sexual, indecent or pornographic or socially offensive images or material.

Should you encounter a situation whilst using social media that threatens to become antagonistic you should politely disengage and seek advice from your line manager or the Communications and Engagement or Human Resources teams.

While using social networking sites in a personal capacity, it should still be recognised that the actions of staff can damage the reputation of the ICB and all communications that are made, even in a personal capacity must not:

- Behave in a manner that would be unacceptable in any other situation
- Bring the ICB into disrepute
- Breach confidentiality
- Make comments that could be considered to be bullying, harassment or discriminatory
- Use offensive or intimidating language
- Use social media platforms in any way which is unlawful
- Post inappropriate comments about colleagues
- Post remarks which may unwittingly cause offence and constitute unlawful discrimination in the form of harassment
- Comment on work-related issues

Reporting Safeguarding Concerns

Any content or online activity which raises a safeguarding concern must be reported to the ICB safeguarding lead.

As a minimum you should ensure you have completed your statutory and mandatory safeguarding e-learning and be aware of your responsibilities to safeguarding children, young people and adults as outlined in the ICB Safeguarding Policy.

Any online concerns should be reported as soon identified as law enforcement and child/adult safeguarding agencies may need to take urgent steps to support the person.

Where a child, young person or adult is identified to be in immediate danger, dial 999 for police assistance.



If you have concerns about a breach in the terms of service for a particular platform, e.g. participation of underage children, nudity in images, use of unsuitable language, grooming, stalking or ideation that could lead to terrorist activities etc. you should report this to the service provider.

If you have concerns about or suspect a colleague is using the internet or social media in a way that raises safeguarding concerns including accessing concerning sites if concerns of radicalisation, or accessing illegal materials, you should seek advice from your line manager or the safeguarding team.

You should also report this activity to your line manager and the Safeguarding Team as consideration may need to be taken regarding continued use of that platform.

You should report any harassment or abuse in the course of your duties or from other employees to your line manager and the Human Resources Team. They will advise you what further action should be taken to keep yourself and others safe. Do not place yourself at risk and engage in risk taking behaviour on social media

Appendix 2

HWEICB photography consent form



ICB image consent
form July 2022.docx



Appendix 3

Equality Impact Assessment and Health Inequality Impact Assessment

Equality Analysis

Title of policy, service, proposal etc. being assessed:
Social media and media engagement policy

What are the intended outcomes of this work? The Policy to be ratified and adopted by the ICB.
How will these outcomes be achieved? What is it that will actually be done? What is it that the proposal will stop, start or change?
Who will be affected by this work? e.g. staff, patients, service users, partner organisations etc. If you believe that there is no likely impact on people explain how you've reached that decision and send the form to the equality and diversity manager for agreement and sign off

Evidence
Impact Assessment Not Required This proposal does not start, stop or change a policy, procedure or practice that could result in a differential impact on individuals or groups where their protected characteristic status would be relevant. A full equality impact assessment is not required and there is likely to be sufficient information for decision makers to be able to show Due Regard, as required by the Equality Act 2010. Paul Curry, Equality and Diversity Lead, 19 January 2023.

