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# Social media policy

## Document Information

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|                                                                                                                                                                                                                                                                      |                                       |                       |                |
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| Trust Management Group                                                                                                                                                                                                                                               |                                       |                       |                |
| Executive Directors Group                                                                                                                                                                                                                                            |                                       |                       |                |
|                                                                                                                                                                                                                                                                      |                                       |                       |                |
|                                                                                                                                                                                                                                                                      |                                       |                       |                |
| Links or overlaps with other policies:                                                                                                                                                                                                                               |                                       |                       |                |
| Disciplinary policy; information governance policy; feedback and complaints policy; child protection policy; media management protocol; approved and invited visitors policy; audio-visual recording by people who use our services and members of the public policy |                                       |                       |                |

## Amendment History

| Issue | Status | Date          | Reason for Change                                                                                                                                                             | Authorised                                    |
|-------|--------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| V1    |        | November 2014 | <i>Complete rewrite of original document due to developments in social media and its usage. Clearer advice on roles and responsibilities and appropriate uses.</i>            | <b>Guy Boosey, Staff side, Anna Alexandra</b> |
| V0.66 |        | July 2017     | <i>Final proof</i>                                                                                                                                                            | <b>Claire Rowe</b>                            |
| V1.1  |        | August 2017   | <i>Changes to include safeguarding requirements for grooming. Plus addition of IG requirements around messaging patient data.</i>                                             | <b>Claire Rowe</b>                            |
| V3    |        | November 2020 | <i>Review and update of policy. Includes amended contact details and update to available social media channels</i>                                                            | <b>Laura Jenkins</b>                          |
| V4    |        | August 2023   | <i>Review and update of policy including feedback from Staff Side and links to guidance from relevant professional bodies. Updated list of platforms and networking sites</i> | <b>Head of Communications and Engagement</b>  |
| V5    |        | November 2025 | <i>Updated to reflect new social media volunteers; strengthened training including global workforce and students working</i>                                                  | <b>Head of Communications and Engagement</b>  |

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|  |  |  | <i>in our services, in light of 3<br/>separate incidents in 2025<br/>(refer to Jake report)</i> |  |
|--|--|--|-------------------------------------------------------------------------------------------------|--|

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## **1. Introduction**

- 1.1 We use social media to engage with colleagues, patients, partner organisations and the public not only to deliver key information but to participate in meaningful conversations that support us to deliver our vision for better health and care for all.
- 1.2 Social media is a part of everyday life with new channels becoming available as technology changes and evolves.
- 1.3 Many of our people, including volunteers and students working in our services, enjoy sharing their knowledge and experience with others in similar roles and with complementary interests. We understand these online activities and acknowledge that our people can improve their skills, experience and practice through meaningful conversations on social media. While we recognise that everyone has a right to privacy in their personal life, we do, however, have a responsibility to ensure the operational effectiveness of our business, including management of our image and reputation, as well as protecting people who use our services, our people and both patient and personal information.
- 1.4 We recognise the positive intent of people in using social media in their professional and personal lives. This policy is intended to support this by providing clarity of expectation and making people aware of the potential risks associated with social media activity. Anyone posting on social media should assume their comments are public for all the world to see for many years to come.
- 1.5 This policy is designed to keep everyone safe and ensure that confidentiality and security is maintained in line with our Information Governance policy.

## **2. Purpose**

- 2.1 This policy is intended to help our people, including volunteers and students working in our services, make appropriate decisions about the use of social media channels (see section 4 definitions).
- 2.2 The purpose of this policy is to outline the standards we expect our people to observe when using social media in both a personal and professional capacity, the circumstances in which we would monitor staff use of social media and the action we will take in respect of breaches of this policy.
- 2.3 If a member of staff (including volunteers and students) identifies an association with our organisation, discusses their work and/or colleagues, or comes into contact or is likely to come into contact with patients on any social media sites, they are expected to behave appropriately and in a way that is consistent with our values and, where relevant, with their professional code of conduct. The duty to act in a manner that is line with the conditions set out in this policy applies when staff are at work and at all times when a connect to the organisation, the NHS or their profession has been made, either explicitly or

obliquely.

- 2.4 The intent of this policy is not to stop people from conducting legitimate activities on the internet, not to stifle constructive criticism, but serves to highlight those areas in which problems can arise for both individual employees, volunteers and students and the organisation.
- 2.5 This policy supports our existing policies around the use of information technology, websites and social networking.

### **3. Scope**

- 3.1 This policy applies to all those working for Torbay and South Devon NHS Foundation Trust including people on temporary contracts, bank staff, agency staff, volunteers, governors, students, people on placements, secondees and contractors who are collectively referred to as staff in this policy.
- 3.2 This policy also applies to staff employed by partner organisations who are based at one of our sites.
- 3.3 If the guidance within this policy is breached, agency staff and contractors will be managed through the policies of their respective employers.
- 3.4 All staff are expected to always comply with this policy to protect the privacy, confidentiality and interests of the NHS, our organisation, our patients, employees, volunteers, students and colleagues.
- 3.5 All staff should be aware that, even if they believe they are using social media sites with enhanced privacy settings applied, this does not exempt them from the guidelines which are outlined in this policy.
- 3.6 Anyone who is believed to be in breach of the guidelines in this policy will be managed in line with our Disciplinary policy or any other policy guiding professional behaviour, including our Constitution. In serious cases, breaches may be treated as gross misconduct, leading to summary dismissal. Contract staff will be managed as in section 3.3.
- 3.7 This policy should be read with reference to relevant professional/union code of conduct such as the General Medical Council, Nursing and Midwifery Council and Health and Care Professionals Council guidelines on social media usage
  - [Social media guidance - The Nursing and Midwifery Council \(nmc.org.uk\)](https://www.nmc.org.uk/social-media-guidance/)
  - [Doctors use of social media - professional standards - GMC \(gmc-uk.org\)](https://www.gmc-uk.org/guidance/standards/doctor/doctors_use_of_social_media_professional_standards.aspx)
  - [Communication and using social media | \(hcpc-uk.org\)](https://www.hcpc-uk.org/communication-and-using-social-media/)
  - [British Medical Association](https://www.bma.org.uk/for-the-public/social-media)
  - Social Work England

### **4. Definitions**

For the purposes of this policy, social media is defined as the collective of online communication channels dedicated to community-based input, interaction, content-sharing and collaboration.

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The type of platform may include (but is not limited to): blogs, messaging sites, social networking sites, image sharing sites, video hosting sites and discussion sites.

Sites include WhatsApp, X (formerly known as Twitter), Facebook (including community groups, closed groups and pages), Instagram, Snapchat, TikTok, LinkedIn, NextDoor, wikis, podcasts, message boards, interactive news sites as well as, Tumblr, Reddit and as well as YouTube. This list is not exhaustive.

## **5. Roles and responsibilities**

- 5.1 All leaders are responsible for promoting and supporting the aims and objectives of this policy.
- 5.2 The Head of Communications has overall responsibility for the effective operation of this policy and is responsible for reviewing the operation of this policy and making recommendations to minimise risks to our organisation.
- 5.3 It is the responsibility of every manager to ensure that our people have a clear understanding of the use of social media inside and outside of the workplace and our social media policies by:
  - encouraging and supporting all staff to read the policy carefully and feedback any questions they may have
  - supporting staff with training, provided by the communications team either in-person or virtually, and individually or to teams, to develop a better understanding of social media and how to use it in their role.
- 5.4 Managers are required to ensure that any issues or concerns reported to them which involve social media use are acted upon in line with this policy and a record kept of the matter that has been raised along with any action taken.
- 5.5 All staff and contractors are responsible for ensuring they understand and follow this policy and the guidance offered with in it. They should understand how the use of social media applies in their work and private life when commenting on something that relates to their work or our organisation. Anyone who is unsure of the guidance or needs clarification should discuss this with their line manager in the first instance, or the communications team.
- 5.6 Staff and contractors are responsible for their online behaviour and must take care to avoid online content or actions that are considered illegal such as inaccurate, libelous, defamatory, harassing, threatening, or grooming (where someone builds an emotional connection with a child or vulnerable adult to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking), or discussing someone or an issue that is either subject to legal proceedings, or naming or identifying someone who is the subject of a court order. As an NHS organisation and provider of adult social care services in Torbay, we also have a legal duty to protect people's personal information, including details about the health and wellbeing and any care and support they are receiving. It is possible for staff to be subject to civil proceedings or criminal prosecution for their online content.
- 5.7 All staff and contractors must ensure that all communications that they make on social media, whether in a personal or professional capacity, cannot be considered to be

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bullying, harassment or discriminatory against any individual or groups with protected characteristics including but not limited to ageism, racism, disability discrimination, gender discrimination or use offensive or intimidating language. This includes making comments, posting images, sharing content or liking or resharing content posted by others.

- 5.8 All staff and contractors are asked to conduct themselves online in the same manner that is expected of them in any other situation – to uphold the reputation of the NHS and our organisation and, where relevant, the reputation of their profession. Professional qualified staff may place their registration at risk if they fail to adhere to their professional guidelines (see section 3.7).
- 5.9 Staff and contractors should not comment on work related issues on social media – any grievance or work-related issues should be raised using our established internal processes.
- 5.10 Volunteers who are sharing news and updates on behalf of our organisation (such as our digital content creator volunteers) must share content with the communications team before it is posted to ensure it adheres to our style guide and communications policy
- 5.11 If a member of staff is concerned about something they read on a social media site which may breach our social media policy guidelines and values, it is their professional responsibility to alert their line manager and report the matter to the communications team who will ensure that any appropriate action is taken.
- 5.12 While we do not routinely monitor social media sites for evidence of staff activity, if it is brought to our attention that inappropriate information, images or comments have been posted, then the allegation will be investigated.

## **6. Principles**

- 6.1 When any member of staff uses social media it is expected that they will behave in a manner which acknowledges the duty of care they owe to their patients, colleagues and the organisation regardless of whether they explicitly state that they work for our organisation.
- 6.2 Once information has been published on the internet it is no longer considered to be private. This means staff will be held accountable for any information posted, liked or in any way endorsed which compromises themselves, their colleagues and/or our organisation. All staff are expected to respect copyright, fair use, data protection, defamation, libel and financial disclosure laws.
- 6.3 Staff are personally responsible for the content they publish on social media – what is published will be in the public domain for many years. This includes on their personal profiles and pages, and also commenting on public or closed group forums. All staff are expected to respect copyright, fair use, data protection, defamation, libel and financial disclosure laws. This includes publishing or sharing images of patients or colleagues, details of any medical or personal details, or speculating on situations that involve our organisation, patients or our staff.

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- 6.4 Staff should be aware that some social media sites have been known to make changes to users' privacy settings without warning and without the knowledge of the users concerned. All staff should regularly check their privacy settings.
- 6.5 It is also important to be aware that other staff or members of the public may, where appropriate, raise concerns with us about content they have viewed on social media to which they have access. They may also be able to share that data with others who would not otherwise be able to see it, without the original user's knowledge or permission, for example, by taking a screen shot.
- 6.6 Staff should also be mindful that connections could be made by members of the public between them making personal use of one site (such as Facebook) and identifying themselves or their colleagues as an employee of the NHS on another (for example LinkedIn) particularly if both sites identify them by a photograph or some other unique personal data.

## **7. Agreed corporate use of social media**

- 7.1 We have a corporate presence on Facebook, X (formerly Twitter), LinkedIn, Instagram and Vimeo. The number and type of corporate channels may change or increase with the development of new social media channels and our business needs. If a member of staff wants to contribute to, or share news stories, events or messages through the corporate social media channels, please contact the communications team which can advise on the best channel to contribute, and they style of message and content – or advise if social media is the best method of communication.
- 7.2 We recognise the importance of social media in shaping public thinking about, and engagement with, our services, staff and partners. We also recognise the importance of our people being able to join in and help shape direction of our corporate engagement with these channels.
- 7.3 All services or staff groups wishing to promote their service, events or activities via social media should send the request and any relevant information to the communication team.
- 7.4 When posting to corporate social media accounts, extreme care must be taken when making comments about the goods and/or services provided by a third party, especially when providing a hyperlink/link to another site. It is the responsibility of the individual to ensure that the link is valid and the content of the site and the good or services provided by the third party will not bring our organisation or the NHS into disrepute.
- 7.5 The use of social media as the sole means of contact or communication with any given individual or group must be avoided as this may discriminate against those who do not have access to such a facility or do not use social media platforms by personal choice.
- 7.6 Posts on our corporate social media accounts will following this guidance:
  - we will not upload, post, forward or post a link to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content
  - we will never disclose commercially sensitive, anti-competitive, private or confidential information

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- we will only upload, post or forward third-party content when we have assured ourselves that it is appropriate to do so
- we will comply with the terms and conditions of any social media platform we use we will not post, upload, forward or post a link to chain mail, junk mail, cartoons, jokes or gossip
- we will always consider others' privacy and avoid discussing topics which may be inflammatory (for example, politics or religion)
- we will be honest and open. If we make a mistake in a contribution we will be prompt in admitting and correcting it
- we will correct any misrepresentations of our organisation or the NHS with facts where we can do so
- we will not escalate heated discussions. We will be conciliatory and respectful. Where appropriate, we will aim to take sensitive, personal or contentious situations offline and offer the contributors an alternative means of contact.

- 7.7 We encourage our people and contractors who use social media channels in a professional capacity to share or like messages shared on our corporate accounts to help promote the content to their network and increase the visibility of the information. They are also encouraged to adapt the content in a professional manner to share on their own channels to help spread the message.
- 7.8 Staff and contractors are not authorised to speak on behalf of us in a formal capacity via social media, **unless this has been agreed by their line manager and approved (in advance) by the Head of Communications**. No social media sites or pages relating to our organisation or services should be set up by staff and/or contractors without prior approval from the Head of Communications.
- 7.9 Approval should be obtained by contacting the communications team which can advise on the chosen channel and ensure that any risks have been discussed. A social media planning form (attached in appendix A) will be completed with the communications team before the request is sent to the Head of Communications for approval. This approval requirement enables us to ensure people are prepared and trained for the proposed online engagement, and any channels that are established are in line with the corporate objectives and comply with [NHS branding and style guidelines](#).
- 7.10 All new professional social media channels should have one approved account manager who is responsible for the content published, even if there are several editors. The communications team can help set up the account and discuss the issues and requirements of the channels.
- 7.11 All approved professional social media channels will be reviewed within a year, and deleted if it is agreed that they are not achieving the agreed objectives set out in the social media planning form.
- 7.12 Staff using social media in a professional capacity must not breach copyright laws when posting or sharing images music and video/filmed content which they have not created. Taking images from Google images, Bing images or other photo libraries can incur a fee, or even prosecution for breaching copyright law. Knowledge of the copyright and usage licence is essential. Please contact the communications team for more information.

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- 7.13 Staff must get permission from colleagues or service in writing before publishing photos and/or videos of them on corporate social media channels, through the use of [model release forms](#)
- 7.14 The communications team will obtain approval from staff, patients, partners and visitors (including dignitaries) to share on social media through the use of [model release forms](#).
- 7.15 The communications team will provide social media training to people who use it in their work to ensure they are aware of latest guidance and best practice and know how to use social media channels to their best effect. Please email [tsdft.communicationsteam@nhs.net](mailto:tsdft.communicationsteam@nhs.net) to discuss your requirements.

## **8. Use of social media at work**

- 8.1 Staff can access or contribute to social media sites using our equipment (work laptops, computers and handheld devices), however, please see 12.3 and 12.4 for information on how we monitor usage and actions that may be taken as a result of inappropriate or excessive use. We reserve the right to withdraw permission at any time if this trust is misused.
- 8.2 We understand that staff may wish to use their own devices such as mobile phones to access social media websites while they are at work but they must limit the use of their own devices so not to interfere with their working time and this access must be limited to their allocated breaks.
- 8.3 Members of staff who are using social media as part of their professional role (for example, communications team colleagues, digital content creator volunteers, or account managers and editors of designated and approved professional social media account) will undertake these duties during their working time as appropriate.
- 8.4 Members of staff who use social media at work as either directly or indirectly in their role must ensure they do not post anything which discloses personal and confidential details about patients or colleagues, such as taking images of medical notes or photos of people who have not given permission (either in a posed image or in the background). This also includes publishing words as well as images.
- 8.5 Posts must not contain any details which might identify a patient through a jigsaw identification process, such as you were working on a named ward on a named day caring for someone who was having a specific procedure, or you are visiting someone who lives on a named road.

## **9. Professional and personal use of social media**

- 9.1 We recognise that some staff may wish to have a professional presence on social media. In doing so, staff are encouraged to ensure that their online conduct meets the expectations and standards set out in this policy and that it does not in any way conflict with their obligations to their employer or the NHS.
- 9.2 Staff must be clear when posting on social media that they are doing so in a personal capacity, that their views are their own and not necessarily the views of our organisation, the NHS or their profession. Staff should also ensure that any

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commercial interests that arise from professional social media use are declared in accordance with our conflicts of interest policy.

- 9.3 Staff must also ensure that they declare any potential conflicts of interest when writing about professional matters online, taking full account of the fact that members of the public, including other staff and patients, may place a high value on their opinions as a clinician or NHS professional. Conflicts of interest may influence financial interests in other organisations or any secondary employment undertaken, for example, in private practice. All such interests should also be declared through our conflicts of interest policy.
- 9.4 Any staff contacted by members of the media for comment following a professional comment they have put on social media should seek advice from the communications team in line with our media management protocol before responding.
- 9.5 We recognise that staff may want to access or contribute to social media sites using their own equipment outside their hours of work and during their authorised breaks at work.
- 9.6 Staff are responsible and personally liable for any comments, images and information they post.
- 9.7 While using social networking sites in a personal capacity and not acting on behalf of our organisation or the NHS, it should still be recognised that staff's actions can damage our reputation. All communications that are made, even in a personal capacity, must not:
  - behave in a manner that would not be acceptable in any other situation
  - bring the NHS or our organisation into disrepute (for example anything that could negatively impact on our reputation or could cause embarrassment to our staff, patients, public or our organisation)
  - breach confidentiality (do not share any personal information about people who use our services or staff colleagues, any confidential corporate information or information which is sensitive or commercial in confidence or is subject to a non-disclosure contact or agreement). This applies to information about people who use our services, other staff and contractors, other organisations, commercial suppliers and other information about our organisation and our work
  - Comment or speculate about historical or live incidents involving our organisation, patients or staff, including critical or major incidents. This would include providing updates and/or sharing photos or videos from our sites on both personal and external social media sites (such as news outlets and community groups such as Spotted). Commenting on ongoing situations may breach people's confidentiality, provide inaccurate details and hamper a response to the incident.
  - publish or report conversations that are private, internal to our organisation or partner agencies (including information shared during a meeting, a consultation or a staff communication)
  - use offensive or intimidating language including personal insults, obscenities or inflammatory language or engage in any conduct that would not be acceptable as an NHS employee
  - use social networking sites in any way which is unlawful including posting any material which breaches copyright or other intellectual property rights or invades the privacy of any person

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- make any detrimental or inappropriate comments about, or in any way use social media to criticise, attack or abuse colleagues or patients (even if their names are not mentioned)
- share details of our implemented security or risk management arrangements. These details are confidential, may be misused and could lead to a serious breach of security occurring.
- post inappropriate comments about colleagues or people who use our services (even if their names are not mentioned)
- post text, images or video that contain information that could potentially identify someone who uses our services (for example, name, address, ID number, voice recording, rare condition or celebrity status)
- post images or video which contain recognisable signs or pictures relating to our organisation or any pictures of staff or people who use our services without their explicit, fully-informed consent
- like, support or endorse content which may unwittingly cause offence and constitute unlawful discrimination in the form of harassment or discrimination toward people with protect characteristics including (but not limited to) race, age, pregnancy, religion and sexual orientation.
- post comments or content which is likely to create any legal problems whether criminal or civil, for either the staff member or our organisation. These include comments that may be seen as slanderous, libelous, defamatory, harassing, or offensive or threatening (trolling).
- use messaging services such as WhatsApp or iMessage to share identifiable or confidential patient data with colleagues within our own organisation or with colleagues in other organisations as they may not be secure. When discussing diagnosis or patient information you must only use NHS email both within our own organisation and between our organisation and other organisations.
- Use messaging services such as WhatsApp, Teams or iMessage to share details about colleagues which may be considered seen as slanderous, libelous, defamatory, harassing, or offensive or threatening (trolling).
- comment on work-related issues. Staff are reminded that any grievance should be raised using the established internal processes. It is legitimate for staff to comment on national issues such as industrial action or government funding but they are expected to do so in a way which does not bring the NHS or our organisation into disrepute.
- reply to negative comments about our organisation or staff members, made by others on social media. If staff are concerned about a negative comment or complaint they see online, do not reply. This includes liking negative comments on Facebook, for example. Instead contact the communications team, who will consider whether to make a corporate response to the comment.

9.8 Staff are reminded that information they share on social media may be classified as online bullying. Examples of online bullying include mean text messages or emails, rumours sent by email or posted on social networking sites and embarrassing pictures or videos. Bullying through this platform can include posting negative comments on pictures, posting abusive posts on a user's wall, using pictures or videos to make fun of another. Many of the acts of bullying on social media are similar to those that would take place in a real-life situation, only in digital form.

9.9 All staff should be mindful of the personal information they disclose on social networking sites, especially with regard to identify theft. Making information such as

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your date of birth, place of work and other personal information publicly available can be high risk in terms of identity theft.

- 9.10 Staff should ensure that when registering on a public social media site they take adequate privacy precautions. There have been cases where NHS staff have had to take out restraining orders on members of the public who display obsessive behaviours such as stalking and online bullying.
- 9.11 Where staff associate themselves with our organisation (through providing work details or joining an NHS network) they should act in a manner which does not bring our organisation, the NHS or their profession into disrepute. This applies to both open and private sections of a site if a member of staff has identified themselves as an employee of our organisation or has connections to work colleagues (such as friends or followers for instance).
- 9.12 Staff should be mindful that their user names on social media sites can demonstrate a connection to our organisation, the NHS or their profession.
- 9.13 Where a member of staff chooses to associate themselves with our organisation or the NHS on a social media site (for example, adding on Facebook, X or LinkedIn where they work or have previously worked) they must add a disclaimer statement in a prominent position (preferably on their profile) which clearly states that whatever is posted represents their personal views only and not necessarily the views of our organisation, the NHS or their profession.
- 9.14 Our logo and the NHS logo must never be used on personal webpages or social media sites other than on our approved sites and pages.
- 9.15 Before posting images or joining any campaigns or causes staff should be aware that it is not just friends who view these but also patients, carers, colleagues, managers and prospective employers.
- 9.16 Within social media sites, individuals or organisations may post comments, pictures or phrases, or launch campaigns to which others individual can indicate their support/agreement by clicking the like button, sharing or quoting. This action is seen to be attaching the staff's name and implied support to the material. This can be seen as being equivalent to posting the comment originally and therefore this action could be considered as a breach of this policy.
- 9.17 When interacting with colleagues online, staff should be ever mindful of their responsibilities to be professional and courteous. They should never engage in any behaviour which attack or abuses any colleagues or act in any way which may damage working relationships.
- 9.18 When content is being uploaded which includes other members of staff, for example, pictures from a social event, then permission should be sought from all colleagues before the item is posted and no images or items should be posted when requests have been made for them not to be posted. Any item that a colleague has asked to be removed which includes them should be removed immediately. This includes seeking approval from colleagues before tagging them in to posts which could identify where they work.

- 9.19 Staff should be aware of the consequences of using any social media site to post content of any kind that conflicts with information they have already provided to our organisation, for example, in relation to their health and fitness for work or any secondary employment that they undertake.

## **10. Staff raising concerns through social media**

- 10.1 If any instances where they are any comments, questions or observations which staff wish to raise in connection with their employment with us, either positive or negative, these should be raised through the appropriate channels internally rather than the views being expressed on social networking sites. Additional guidance and support is available via line managers and our people team.
- 10.2 Staff should be aware that this may also apply to private messages exchanged between work colleagues as, although they may not necessarily be seen by a wider audience, they may still be brought to our attention.

## **11. Monitoring use of social media sites**

- 11.1 Staff should be aware that any use of social media platforms (whether or not accessed for work purposes) may be monitored and where breaches of this policy are found, action may be taken under the disciplinary policy.
- 11.2 If concerns are raised with us by another member of staff or a member of the public about the online behaviour of any member of staff, we will be required to investigate this. We may, therefore, obtain copies of data posted on social media and these may be kept electronically or in hard copy. This data will be retained by us in line with our policies on records management.
- 11.3 We reserve the right to monitor staff's internet use on any of our devices in line with our information technology policies. Any data obtained about a member of staff's internet use on work devices may form part of an investigation under the disciplinary policy.
- 11.4 We reserve the right to restrict or prevent access to certain social media platforms if personal use is considered to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

## **12. Reporting inappropriate behaviour on social media**

- 12.1 If there is an instance where the guidance set out in this policy appears to have been breached, staff should report the issue immediately to the communications team who will ensure appropriate action is taken by the relevant department.
- 12.2 This may result in investigation by the information governance team and/or investigation under the disciplinary policy depending on circumstances.
- 12.3 Any member of staff who sees a negative comment about another member of staff online should contact the communications team as soon as possible and, where possible, take a screen shot or copy of the offending message. We ask for a copy or

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screenshot because we may not have access to the message if it is shared on a private account. Depending on the nature of the comment, the message may be shared with the member of staff's line manager and other relevant teams (for example, information governance, people hub). The member of staff's line manager will ensure that they have access to wellbeing support as needed through our employee assistance programme or other avenues of support.

- 12.4 If the comment concerns a concern or complaint about the staff member's work, rather than a complaint about them personally, a copy of the message will be sent to the Patient Advice and Liaison Service (PALS) for action in line with our feedback and complaints policy.
- 12.5 Where staff members are named or mentioned on social media in a way that is perceived to be threatening or abusive, which risks the wellbeing of staff, or where their safety is of concern, the comment will be passed to our people team to discuss with the member of staff's line manager and to make a decision on how to proceed. The line manager will share the comment with the member of staff and ensure that they have access to wellbeing support as needed. Other teams such as legal services, safeguarding or security may be copied into correspondence, depending on the information provided in the comment and the language used and, where appropriate, information may be shared with outside agencies such as the police.

### **13. Breaches of this policy**

- 13.1 If there is an instance where the guidance set out in this policy appears to have been breached and the breach is brought to our attention, then the matter will be investigated to ascertain the nature and extent of the concerns which have been raised.
- 13.2 This will be managed in line with our disciplinary policy and, depending on the severity, may result in summary dismissal. For professionally qualified staff this may also result in referral to their professional body.
- 13.3 As outlined in section 3.3, any identified issues in relation to agency staff and contractors will be managed through the policies of their respective employers.
- 13.4 Where the social media guidelines outlined in this policy have been breached, the following procedures will be used:
  - The member of staff's line manager (or contracted organisation) will be contacted and they will carry out a preliminary investigation to find out what happened. The staff member will be asked to remove the statement, message or content and given an explanation about why it should be removed. This may involve a discussion with a complainant, a witness, or the staff member. Whenever possible an initial written account of the events should be obtained. If it is necessary to discuss the incident with the member of staff, they should be told it is not a formal disciplinary meeting and is solely to establish the facts. There is no right to representation at this meeting. The member of staff must also be advised that an outcome of the preliminary investigation will identify if there is a need for them to attend a further formal meeting.

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- Where the matter appears to be of a minor nature, the manager should deal with the issue informally, as in accordance with (section 10.3) Informal Action of our disciplinary policy. If, however, following the preliminary investigation further investigation is needed, or the matter is a potential disciplinary incident, a formal investigation will be conducted in line with our disciplinary policy.

13.5 If an employee finds their account details have been obtained by another person without their permission (hacked) and these guidelines are broken as a result, they must rectify the problem as soon as possible by deleting any problematic messages and reporting the incident immediately to the communications team. If a professional account is involved, the South Devon Health Informatics Service will also be informed. The incident should be reported to the social media provider and/or the police if the incident involves criminal activity.

## **14. Training and awareness**

- 14.1 Advice and support will be provided by our information governance, communications and people teams as appropriate to support staff and managers to understand and follow the guidance outlined in this policy and to follow best practice when dealing with issues in relation to social media.
- 14.2 Social media training is available for teams and individuals on request from the communications team.
- 14.3 Regular updates about the appropriate and safe use of social media will be shared with colleagues through ICONews, screen savers and Trust Talk and staff inductions.

## **15. Distribution**

- 15.1 This policy document will be made available to staff via ICON, our website and signposted in ICONews (our staff bulletin).
- 15.2 Awareness will be raised through Equality Impact Assessment training, all ratifying committees/groups, policies and procedures training and ICON.

## **16. Key contacts**

Communications team    communications.tsdf@nhs.net    01803 217398

Unclassified

## **17. Appendices**

Appendix 1: Rapid Equality Impact Assessment

Appendix 2: Social media request form

Appendix 3: Social media guidance for staff

Unclassified

## Appendix 1

## Rapid Equality Impact Assessment (for use when writing policies and procedures)

|                                                                                                                                                                                                                                                                                                             |                                                                     |                      |                                                                     |                               |                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|----------------------|---------------------------------------------------------------------|-------------------------------|------------------------------------------------------------------------|
| <b>Policy Title (and number)</b>                                                                                                                                                                                                                                                                            | <b>Social media policy</b>                                          |                      | <b>Version and Date</b>                                             | Version 5 05<br>November 2025 |                                                                        |
| <b>Policy Author</b>                                                                                                                                                                                                                                                                                        | Head of Communications and Engagement                               |                      |                                                                     |                               |                                                                        |
| An equality impact assessment (EIA) is a process designed to ensure that a policy, project or scheme does not discriminate or disadvantage people. EIAs also improve and promote equality. Consider the nature and extent of the impact, not the number of people affected.                                 |                                                                     |                      |                                                                     |                               |                                                                        |
| <b>EQUALITY ANALYSIS:</b> How well do people from protected groups fare in relation to the general population?                                                                                                                                                                                              |                                                                     |                      |                                                                     |                               |                                                                        |
| <b>PLEASE NOTE:</b> Any 'Yes' answers may trigger a full EIA and must be referred to the equality leads below                                                                                                                                                                                               |                                                                     |                      |                                                                     |                               |                                                                        |
| <b>Is it likely that the policy/procedure could treat people from protected groups less favorably than the general population? (see below)</b>                                                                                                                                                              |                                                                     |                      |                                                                     |                               |                                                                        |
| Age                                                                                                                                                                                                                                                                                                         | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Disability           | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Sexual Orientation            | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>    |
| Race                                                                                                                                                                                                                                                                                                        | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Gender               | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Religion/Belief (non)         | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>    |
| Gender Reassignment                                                                                                                                                                                                                                                                                         | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Pregnancy/ Maternity | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Marriage/ Civil Partnership   | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>    |
| <b>Is it likely that the policy/procedure could affect particular 'Inclusion Health' groups less favorably than the general population?</b> (substance misuse; teenage mums; carers <sup>1</sup> ; travellers <sup>2</sup> ; homeless <sup>3</sup> ; convictions; social isolation <sup>4</sup> ; refugees) |                                                                     |                      |                                                                     |                               | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>    |
| <b>Please provide details for each protected group where you have indicated 'Yes'.</b>                                                                                                                                                                                                                      |                                                                     |                      |                                                                     |                               |                                                                        |
| <b>VISION AND VALUES:</b> Policies must aim to remove unintentional barriers and promote inclusion                                                                                                                                                                                                          |                                                                     |                      |                                                                     |                               |                                                                        |
| Is inclusive language <sup>5</sup> used throughout?                                                                                                                                                                                                                                                         |                                                                     |                      |                                                                     |                               | Yes <input checked="" type="checkbox"/><br>No <input type="checkbox"/> |
| Are the services outlined in the policy/procedure fully accessible <sup>6</sup> ?                                                                                                                                                                                                                           |                                                                     |                      |                                                                     |                               | Yes <input checked="" type="checkbox"/><br>No <input type="checkbox"/> |
| Does the policy/procedure encourage individualised and person-centered care?                                                                                                                                                                                                                                |                                                                     |                      |                                                                     |                               | Yes <input checked="" type="checkbox"/><br>No <input type="checkbox"/> |
| Could there be an adverse impact on an individual's independence or autonomy <sup>7</sup> ?                                                                                                                                                                                                                 |                                                                     |                      |                                                                     |                               | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>    |
| If 'Yes', how will you mitigate this risk to ensure fair and equal access?                                                                                                                                                                                                                                  |                                                                     |                      |                                                                     |                               |                                                                        |
| <b>EXTERNAL FACTORS</b>                                                                                                                                                                                                                                                                                     |                                                                     |                      |                                                                     |                               |                                                                        |
| <b>Is the policy/procedure a result of national legislation which cannot be modified in any way?</b>                                                                                                                                                                                                        |                                                                     |                      |                                                                     |                               | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>    |
| <b>What is the reason for writing this policy?</b> (Is it a result in a change of legislation/ national research?)                                                                                                                                                                                          |                                                                     |                      |                                                                     |                               |                                                                        |
| To facilitate a standardised approach to policy documents across the Trust                                                                                                                                                                                                                                  |                                                                     |                      |                                                                     |                               |                                                                        |
| <b>Who was consulted when drafting this policy/procedure? What were the recommendations/suggestions?</b>                                                                                                                                                                                                    |                                                                     |                      |                                                                     |                               |                                                                        |
| Recommendations were received from Staff Side when reviewing the policy to ensure language is consistent with our just and learning culture.                                                                                                                                                                |                                                                     |                      |                                                                     |                               |                                                                        |
| <b>ACTION PLAN:</b> Please list all actions identified to address any impacts                                                                                                                                                                                                                               |                                                                     |                      |                                                                     |                               |                                                                        |

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| Action                                                                                                                                | Person responsible | Completion date                       |
|---------------------------------------------------------------------------------------------------------------------------------------|--------------------|---------------------------------------|
| <b>AUTHORISATION:</b><br>By signing below, I confirm that the named person responsible above is aware of the actions assigned to them |                    |                                       |
| <b>Name of person completing the form</b>                                                                                             | Laura Patrick      | <b>Signature</b> <i>Laura Patrick</i> |
| <b>Validated by (line manager)</b>                                                                                                    | Jane Harris        | <b>Signature</b> <i>Jane Harris</i>   |

**Any issues please contact [tsdft.diversityandinclusion@nhs.net](mailto:tsdft.diversityandinclusion@nhs.net)**

<sup>1</sup> Consider any additional needs of carers/ parents/ advocates etc, in addition to the service user

<sup>2</sup> Travellers may not be registered with a GP - consider how they may access/ be aware of services available to them

<sup>3</sup> Consider any provisions for those with no fixed abode, particularly relating to impact on discharge

<sup>4</sup> Consider how someone will be aware of (or access) a service if socially or geographically isolated

<sup>5</sup> Language must be relevant and appropriate, for example referring to partners, not husbands or wives

<sup>6</sup> Consider both physical access to services and how information/ communication is available in an accessible format

<sup>7</sup> Example: a telephone-based service may discriminate against people who are d/Deaf. Whilst someone may be able to act on their behalf, this does not promote independence or autonomy

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## Appendix A - social media request form

Who is requesting a social media channel?

What channel would you like and why?

Why would you like to use this channel? ?

Aim/purpose of the channel?

Profile description ~ when the channel will be staffed (in case someone wants to contact you), who is it aimed at? (please use fewer than 140 characters)

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Risks and processes of using a social media ~ for example what happens if you're contacted by someone who is upset out of hours, how will you deal with complaints or sensitive data?

Account name:

Handle/name of user:

Do you want to add any images to your profile, please attach to your email with this document?

**Special instructions (communications team to complete):**

Date set up:

Date to review channel/stream:

## Social media guidance for staff

Using social media in a professional capacity can offer many benefits for you as an individual and for us as an organisation, so we don't want to put you off using these channels. The best advice is to approach social media with **common sense**.

*Think before you post! Would you say it to your manager, colleagues, friends and family? Would you say it in a public space or a busy workplace where members of the public and your colleagues can hear you? If not, then don't say it on social media.*

### Tips on how you can enjoy the benefits of social media:

- it's a great way to keep up to date with your friends and colleagues
- if you wish to reply to positive feedback about our services on social media, please do so in a professional manner as you are representing our organisation (even from a personal account)
- share or repost positive comments about your team, helping ensure positive feedback reaches more accounts and you can share your good news
- follow our corporate accounts to keep up to date with our latest news
- if you have any work-related success stories or other information you would like to share with the public on corporate channels, please send them to the communications team
- if a journalist or someone from the media contacts you through social media for a comment or to discuss an issue, contact the communications team. Don't reply by yourself
- remember, only use social media in work time if it's an agreed part of your job or during your breaks
- read our social media policy

### Security tips to keep you safe

- keep your password safe and avoid using obvious ones that others might easily guess. Good practice is to follow our requirements for computer systems internally
- be careful about the personal details you post online such as address, phone number, email and date of birth; don't make stalking or identity fraud easy
- when you set up an account, make sure you look at the security settings. Ensure you have the right settings to only allow the people you want to view your content and information and check them regularly
- make sure you know how to block or report any users that say something upsetting or offensive
- be suspicious of any contacts that you don't know asking for any personal or work-related information
- think before you send sensitive pictures through social media, even to loved ones. Remember, everything you send, even if deleted, can be found if someone looks hard enough
- many employers and potential employers look at social media channels to find out more about you, so watch what content you publish and the pictures you're tagged in

For advice, contact the communications team on [communications.tsdf@nhs.net](mailto:communications.tsdf@nhs.net) or 01803 654286.

## **Avoiding potential risks on social media**

Some people after a hard day at work will go home and share the problems and issues faced throughout the day on social media. However, few of us realise that some of the information we share could have serious consequences.

We aren't preventing anyone from social media, but we want to help you understand the impact that its use can have and support you to enjoy the many benefits.

You may believe that what you write on your personal profiles is your personal opinion and has no effect on your work life. However, what you may not be aware of is some content can breach contracts of employment or even the law. Here are some quick tips on what you can avoid.

Don't:

- make critical, untrue or harmful colleagues about our organisation, the people we care for or work colleagues
- discuss people we care for, past or present, or post information on their condition or illness that could identify them
- share details about your role which might inadvertently identify a patient without naming them (such as naming a work location and procedure you are involved with)
- take videos or photos of the people in our care or colleagues and publish them on social media without their formal consent
- comment or discuss any private or confidential work information
- comment or discuss historical or live situations involving our colleagues, patients or our sites which are impacted by a critical or major incident which may result in inaccurate updates being shared and / or a breach of patient or staff confidentiality
- use personal insults, swear or use unprofessional language that could be seen as sexist, homophobic, racist or generally offensive
- post comments or content that could be seen as libellous (a comment that is untrue and harmful to a person's reputation), harassing (publishing comments that are annoying or upsetting or send messages that are seen as offensive or threatening (known as trolling))
- reply to negative comments made by the public about our organisation, colleagues or services on any social media channels. If you are concerned about a comment or complaint you see online, please contact the communications team to discuss next steps

Remember, you are responsible for what you write on social media and anything you post will stay in the public domain for a very long time, so please be careful.