



## Use of Social Media Policy and Procedure

Notice to employees using a paper copy of this policy  
The company Policies folder on the shared drive holds the most recent version of this document and all employees must ensure that they are using the most recent guidance.

## Document Control

<b>Document Name</b>	Use of Social Media
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## Version Control

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1.0	Jan 2018	Karen Hodgkinson	New policy implemented
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## **Introduction**

Libertatem Healthcare acknowledges the broad use of social media within society and this policy is intended to help employees make appropriate decisions about the use of social media such as blogs, wikis, social networking websites, podcasts, forums, message boards, or comments on web-articles such as, but not limited to, Twitter, Facebook, LinkedIn etc.

This policy outlines the standards we require employees to observe when using social media in both a personal and professional capacity. The policy will also detail the circumstances in which we will monitor staff use of social media and the action we will take in respect of breaches of this policy.

## **Scope**

This policy covers all individuals working at Libertatem Healthcare Group. All employees are expected to comply with this policy at all times to protect the privacy, confidentiality, and interests of the company, employees, and clients. Breach of this policy may be dealt with under the Libertatem Healthcare Group Disciplinary Policy and in serious cases, may be treated as gross misconduct leading to summary dismissal.

## **Responsibilities**

### **Board of Directors**

The Board of Directors have overall responsibility for the effective operation of this policy and are responsible for reviewing the operation of the policy in line with changes in legislation and to minimise risk the Libertatem Healthcare Group.

The Directors or a nominated deputy will maintain a register of all approved social media sites and pages which are used promote Libertatem Healthcare Group. All content posted or published via the sites on behalf of Libertatem Healthcare Group will be checked to ensure they are compliant with this policy.

### **Employees**

All employees are responsible for their own compliance with this policy and for ensuring that it is consistently applied. All employees should ensure that they take the time to read and understand it. Any breach of this policy must be reported to the line manager or a Director of Libertatem Healthcare Group.

If an employee is concerned about something they read on a social media site, it is their professional responsibility to alert their line manager, and complete an incident report.

Libertatem Healthcare Group does not routinely monitor social media sites for evidence of employee activity. However, if it is brought to the attention of the Directors that inappropriate information, images or comments have been posted, then the allegation will be investigated.

## **Procedure**

### **Company Approved Social Media Pages That Promote Libertatem Healthcare Group**

Libertatem Healthcare Group recognise the importance of the internet in shaping public thinking about the Company and our services, employees, partners and clients. We also recognise the importance of our employees joining in and helping shape the conversation and direction through appropriate interaction in social media.

### **General guidance for the contents of posts or publications via Company approved social media sites or pages:**

- Do not upload, post, forward or post a link to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content.

- Any employee who feels that they have been harassed or bullied, or are offended by material posted or uploaded by a colleague onto a social media website should inform their line manager who will contact a Director to investigate,
- Never disclose commercially sensitive, anti-competitive, private or confidential information. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss this with your line manager.
- Do not upload, post or forward any content belonging to a third party unless you have that third party's consent.
- Before you include a link to a third party website, check that any terms and conditions of that website permit you to link to it. All links must be done so that it is clear to the user that they have moved to the third party's website.
- When making use of any social media platform, you must read and comply with its terms of use.
- Do not post, upload, forward or post a link to chain mail, junk mail, cartoons, jokes or gossip.
- Be honest and open, but be mindful of the impact your contribution might make to people's perceptions of us as an organisation. If you make a mistake in a contribution, be prompt in admitting and correcting it.
- You are personally responsible for content you publish into social media tools – be aware that what you publish will be public for many years.
- If you feel even slightly uneasy about something you are about to publish, then you shouldn't do it.
- Don't discuss colleagues, competitors, clients without their prior approval.
- Always consider others' privacy and avoid discussing topics that may be inflammatory e.g. politics and religion.
- The use of social media as the sole means of contact or communication with any given group must be avoided as this may discriminate against those who do not have access to such a facility.
- If you notice any content posted on social media about us (whether complimentary or critical) please report it to your line manager or the Communications Manager or Business Relations Manager in their absence.

### **Social Networking Using Privately Owned Equipment**

Libertatem Healthcare Group recognises that employees may want to access or contribute to social media sites using their own equipment outside their hours of work and in their own personal time. This includes authorised breaks.

Staff are responsible and personally liable for any comments, images and information they may post. This includes posting information, images or making comments that are:

- Speculative, derogatory, discriminatory, could bring the Company into disrepute; could impact negatively on the Company's reputation; could cause embarrassment to the Company, clients or third parties
- Sensitive or confidential information (e.g. any personal information about clients or employees, or any confidential corporate information –in respect of Confidentiality).
- Information that could potentially identify a client (e.g. a client's name, address, postcode, photograph, voice recording, rare condition, celebrity status etc.)
- About clients or colleagues which could cause offence, even if their names are not mentioned.
- Images that are discriminatory or could amount to bullying or harassment.
- Recognisable signs or pictures relating to the Company, or any pictures employees or clients without their explicit, fully-informed consent.

- About a work-related grievance. Employees are reminded that any grievance should be raised using the Grievance Policy and Procedure.
- Employees should be aware that any use of social media, whether or not accessed for work purposes may be monitored and, where breaches of this policy are found, action may be taken under the Company's Disciplinary policy.

Employees should consider the following advice if they decide to use social media sites.

- Do not reveal personal details such as your date of birth or contact details. Disclosing this information could put you at risk of identity fraud.
- Before posting images or joining any campaigns/causes, be aware that it is not just your friends who may see this, but also clients, colleagues, managers and prospective employers.
- If, after careful consideration, you decide to post comments relating to your work in any way, you should make it clear that the comments expressed are your own and not those of your employer.
- Where a professional code of conduct exists, for example NMC, these must also be adhered to.

### **Whats app Groups**

As a company we recognise the usefulness of whats app as a quick means of getting important messages out to care support teams efficiently, to ensure that important pertinent information is shared with all members of the team.

To ensure this is managed safely and effectively Libertatem Healthcare request that each group has

- A member of the Libertatem operational or clinical team acting as a moderator
- That ALL members of a client care team are involved in the group
- That all information is shared in such a way that the client is not identifiable
- That any family members are added into the team group at the discretion of the LHG operations and clinical team
- That staff do not have private groups between themselves and the client or clients family
- That the group is not used to share personal information, and that respect is shown at all times to every member of the group.

### **Interactions involving different groups**

#### **Our Clients**

You must respect confidentiality at all times and never disclose information that could lead to a client or their family being identified.

In order to maintain professional boundaries, do not make contact with any clients or their families through social media.

#### **Work colleagues**

When interacting with colleagues online, employees should be mindful of their responsibility to be professional and courteous and never use social media to attack or abuse any colleagues.

When uploading content that includes other employees, for example, pictures from a social event, get permission from colleagues first and do not post anything they have asked you not to. If a colleague asks for something that includes them to be removed, it should be removed immediately.

On social media sites, people can show support or agreement for comments, pictures or phrases by clicking the 'like' button. Anyone who does this will attach their name and implied support to the material and may call their conduct into question.

Employees should be aware of the consequences of using any social media site to post content of any kind that conflicts with information they have provided to the Company. These actions could bring about disciplinary proceedings that could result in dismissal.

### **Breaches of the policy**

If ever the guidelines set out in this policy appear to have been breached and brought to the Company's attention, the matter will be investigated to ascertain the nature and the extent of any breach. The investigation should be carried out in accordance with the Company's policy and procedures for managing disciplinary offences.

Complaints about the use of social networking sites or other online activity will be taken as seriously as any other breaches by the Company. Consideration should be given to:

- Any professional boundaries that have been crossed
- Any breach of confidentiality
- Whether an association with the Company has been identified
- Whether any of the material is offensive to colleagues or service users or potentially damaging to the reputation of any party to whom the member of staff owes a duty of care as an employee of the Company

If employees are concerned about another employee's behaviour online, they should report this to their line managers, along with any supporting evidence of their claim, so that the appropriate action can be taken in accordance with Company policies.