

SOCIAL MEDIA AND ACCEPTABLE COMPUTER USE POLICY

Authorship:

Amy Campbell, Communications Manager & Kirsten Spark, Engagement Manager

Approved by: Executive Team

Approved date: 10 September 2019

Review Date: July 2021

Equality Impact Assessment: Completed

Sustainability Impact Assessment: Completed

Target Audience: North Lincolnshire CCG staff

Version Number: 1.0

The intranet version is the only version that is maintained. Any printed copies should, therefore, be viewed as 'uncontrolled' and as such may not necessarily contain the latest updates and amendments.

POLICY AMENDMENTS

Amendments to the policy will be issued from time to time. A new amendment history will be issued with each change.

Version no.	Issued by	Amendment	Approved by	Date on intranet
1.0	NLCCG		Exec Team 10 Sep 2019	28 Oct 019

CONTENTS

1. Policy statement

- 1.1** This policy is intended to help employees of North Lincolnshire Clinical Commissioning Group (CCG) make decisions about the appropriate use of computer equipment, network services and the use of social media such as blogs, wikis, social networking sites, podcasts, forums, message boards or comments on web articles such as Twitter, Facebook, LinkedIn or any other social media platforms.

- 1.2** This policy is designed to protect the CCG, our employees and other partners from harm caused by the misuse of our IT systems and the use of social media. Employees' use of social media can pose risks to our confidential and proprietary information and reputation, and can jeopardise its compliance with legal obligations. Potential damage from misuse of our IT systems includes, but is not limited to, malware infection (e.g. computer viruses), legal and financial penalties for data leakage, and lost productivity resulting from network downtime.

- 1.3** This policy outlines the standards we require staff to observe when using IT systems and social media, the circumstances in which we will monitor use of social media and the action we will take in respect of breaches of this policy.

- 1.4** This policy supplements our e-mail acceptable usage policy.

- 1.5** This policy does not form any part of any contract of employment and may be amended at any time.

2. Who is covered by the policy?

- 2.1** This policy covers all individuals working at all levels, including directors, Governing Body members, officers, employees, consultants, contractors, trainees, apprentices, homeworkers, part-time and fixed-time employees, relief, agency staff and volunteers (collectively referred to as employees in this policy).
- 2.2** Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy.
- 2.3** All employees are expected to comply with this policy at all times to protect the privacy, confidentiality and interests of the CCG and our services, employees, partners, service users, patients and competitors.
- 2.4** This policy deals with all IT equipment that connects to the corporate network or accesses corporate applications and all standalone devices including telephones issued to staff for work purposes. This includes, but is not limited to, desktop computers, laptops, smartphones, tablets, printers, data and voice networks, networked devices, software, electronically-stored data, portable data storage devices, third party networking services, telephone handsets, video conferencing systems, and all other similar items commonly understood to be covered by this term.
- 2.5** This policy deals with the use of all forms of social media including Facebook, LinkedIn, Twitter, Wikipedia, all other social networking sites and all other internet postings, including blogs.
- 2.6** This policy applies to the use of social media for both business and personal purposes, whether during working hours or otherwise. The policy applies regardless of whether the social media is being accessed using our IT facilities or equipment belonging to employees.

- 2.7** Breach of this policy may be dealt with under the CCG's disciplinary procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.
- 2.8** Disciplinary action may be taken regardless of whether the breach is committed during working hours and regardless of whether our equipment or facilities are used for the purpose of committing the breach. Any employees suspected of committing a breach of this policy will be required to co-operate with an investigation, which may involve handing over relevant passwords and login details.
- 2.9** Employees may be required to remove internet postings which are deemed to constitute a breach of this policy.

3. Responsibility for implementation of the policy

- 3.1** The Chief Operating Officer has overall responsibility for the effective operation of this policy.
- 3.2** The Head of People is responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimise risks to our operations.
- 3.3** Employees are responsible for their own compliance with this policy and for ensuring that it is consistently applied. All staff should ensure that they take the time to read and understand it. Any breach of this policy should be reported to the individual's line manager.
- 3.4** Questions regarding the content or application of this policy should be directed to the Head of People.

4 Using social media sites in our name

- 4.1** Only employees who are required to do so as part of their role are permitted to post material on a social media website in the CCG's name and/or on its behalf. Any breach of this restriction could lead to gross misconduct.
- 4.2** Before using work-related social media you must have read and understood this policy.

5 Inappropriate use of computer / IT services

- 5.1** The use of computers and internet services in the following types of activities is specifically prohibited:
- Illegal, fraudulent, or malicious activities
 - Partisan political activity, political or religious lobbying or advocacy or activities on behalf of organisations having no connection with the CCG
 - Unauthorised fund-raising or similar activities, whether for commercial, personal, or charitable purposes
 - Accessing, storing, processing, displaying, or distributing offensive or obscene material such as pornography and hate literature
 - Using another person's account or identity without his or her explicit permission, e.g. by forging e-mail
 - Viewing, damaging, or deleting files belonging to others without appropriate authorisation or permission
 - Attempting to circumvent or defeat security or auditing systems without prior authorisation and other than as part of legitimate system testing or security research
 - Obtaining, installing, storing, or using software obtained in violation of the appropriate vendor's patent, copyright, trade secret, or license agreement.

6 Appropriate use of CCG-owned equipment

6.1 Work mobile phones and tablets are issued to some staff at NHS North Lincolnshire. These devices have the capability of installing many different apps, however mobile devices are issued for work purposes and staff should refrain from downloading and using apps that are not related to business purposes or may introduce risks relating to malware and cyber-attacks.

7 Compliance with related policies and agreements

7.1 Social media should never be used in a way that breaches any of our other policies. If an internet post would breach any of the policies in another forum, it will also breach them in an online forum. For example, employees are prohibited from using social media to:

- Breach our email acceptable usage and/or the internet acceptable usage policies
- Breach our obligations with respect to the rules of relevant regulatory bodies
- Breach any obligations relating to confidentiality
- Breach the disciplinary procedure
- Defame or disparage the CCG or its affiliates, patients, service users, business partners, suppliers vendors or other stakeholders
- Harass or bully other staff in any way
- Unlawfully discriminate against other staff or third parties
- Breach our Data Protection policy (for example, by disclosing personal information about a colleague online)
- Breach any other laws or ethical standards (for example, by using social media in a false or misleading way such as by claiming to be someone else or by making misleading statements).

7.2 Employees should never provide references for other individuals on social or professional networking sites, as such references, positive or negative, may

be attributed to the organisation and create legal liability for both the author of the reference and the organisation.

8 Rules for use of social media for work purposes

Whenever you use social media in accordance with this policy including use for work purposes, you must adhere to the following general rules:

- 8.1** Always write in the first person, identify who you are and what your role is and use the following disclaimer: “The views expressed are my own and do not reflect the views of my employer.”
- 8.2** Do not upload, post or forward a link to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content.
- 8.3** Any employees who feel they have been harassed or bullied, or who are offended by material posted or uploaded by a colleague onto a social media website should inform their line manager or a member of the HR Operations team.
- 8.4** Do not upload, post or forward personal identifiable information of patients and/or their relatives.
- 8.5** Never disclose commercially sensitive, private or confidential information. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss with your line manager.
- 8.6** Do not upload, post or forward any content belonging to a third party unless you have that third party’s consent.
- 8.7** It is acceptable to quote a small excerpt from an article, particularly for the purpose of commenting on it. However, if you think an excerpt is too big, it

probably is. Accurately include references and when in doubt, link, don't copy.

- 8.8** 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.
- 8.9** When making use of any social media platform, you must read and comply with its terms of use.
- 8.10** Do not post, upload or forward a link to chain mail, junk mail, cartoons, jokes or gossip.
- 8.11** Be honest and open, but be mindful of the impact your contribution might make to people's perceptions of the CCG as an organisation. If you make a mistake in a contribution, be prompt in admitting and correcting it.
- 8.12** You are personally responsible for content you publish using social media tools – be aware that what you publish could be public for many years.
- 8.13** Don't escalate heated discussions. Try to be conciliatory, respectful and quote facts to lower the temperature and correct misrepresentations. Never contribute to a discussion if you are angry or upset, return to it later when you can contribute in a calm and rational manner.
- 8.14** If you feel even slightly uneasy about something you are about to publish, then you shouldn't do it. If in doubt, always discuss it with your line manager first.
- 8.15** Don't discuss colleagues, competitors, service users, patients or suppliers without their prior approval.

- 8.16** Always consider others' privacy and avoid discussing topics that may be inflammatory e.g. politics and religion.
- 8.17** Avoid publishing your contact details where they can be accessed and used widely by people you did not intend to see them and never publish anyone else's contact details.
- 8.18** Before your first contribution on any social media site, observe the activity on the site for a while before launching in yourself to get a feel for the style of contributions, the nature of the content and any 'unwritten' rules that other contributors might follow.
- 8.19** Activity on social media websites during working hours should complement and/or support your role and should be used in moderation.
- 8.20** If you notice any content posted on social media about the CCG (whether complimentary or critical) report it to your line manager.

9. Use of social media in your personal life at work

- 9.1** The CCG understands employees may wish or need to use their own devices, or sometimes a work device, to access social media websites for communication purposes. Employees must limit this to their own time e.g. official rest breaks such as their lunch break or before or after work when they are not on duty.
- 9.2** CCG devices should not be used to access social media sites when outside of work unless it is for a valid work reason.

10. Social media in your personal life

- 10.1** The CCG recognises that many staff make use of social media in a social capacity. While they are not acting on behalf of the CCG, employees must be

aware that they can damage the CCG if they are recognised as being one of our employees.

10.2 Employees must ensure their use of social media at all times complies with policies or requirements of any professional or regulatory bodies relevant to their profession.

10.3 Employees are allowed to say that they work for the CCG, which recognises that it is natural for its employees sometimes to want to discuss their work on social media.

10.4 If employees do discuss their work on social media (for example, giving opinions on their specialism or the sector in which the CCG operates) they must include on their profile a statement along the following lines: “The views I express here are mine alone and do not necessarily reflect the views of my employer.”

10.5 Any communications that staff make in a personal capacity through social media must comply with the CCG’s policies and also must not:

- Bring the CCG into disrepute, or risk bringing the CCG into disrepute, for example by criticising or arguing with colleagues, patients, service users or competitors; making defamatory comments about the CCG, individuals or other organisations or groups; posting images that are inappropriate or links to inappropriate content.
- Breach confidentiality, for example by revealing trade secrets or information owned by the CCG; giving away confidential information about an individual (such as a colleague, patient or customer contact) or organisation; discussing the CCG’s internal workings (such as agreements that it is discussing or its future plans that have not been communicated to the public)

- Breach copyright, for example by: using someone else's images or written content without permission; failing to give acknowledgement where permission has been given to reproduce something
- Do anything that could be considered discriminatory against, or bullying or harassment of, any individual, for example by: Making offensive or derogatory comments relating to sex, gender reassignment, race, disability, sexual orientation, religion or belief or age; using social media to bully another individual; posing images that are discriminatory or offensive or links to such content.

10.6 Employees need to be considerate to other employees when using social media websites. For example, there may be an expectation that photographs taken at a private CCG event or work evening out will not appear publicly on the internet. Employees should be considerate to their colleagues in such circumstances and should not post information when they have been asked not to. Employees should also remove information about a colleague if that colleague asks them to do so.

10.7 Inappropriate use of social media websites during periods of sickness absence, suspension, gardening leave or other absences from work may also be classed as a breach of this policy.

11. Monitoring use of social media websites

11.1 Employees should be aware that any use of social media websites (whether or not accessed for work purposes) may be monitored and, action may be taken where breaches of this policy are found.

11.2 The CCG reserves the right to restrict or withdraw our permission to use/access certain social media websites for work purposes at any time.

11.3 Monitoring is only carried out to the extent permitted or as required by law and as considered necessary and justifiable for business purposes.

11.4 Misuse of social media websites can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal or regulatory liability against you and us. It may also cause embarrassment to us and our service users and patients.

11.5 In particular posting, uploading or forwarding a link to any of the following types of material on a social media website, whether in a professional or personal capacity, will amount to gross misconduct (this list is not exhaustive):

- pornographic material (that is, writing, pictures, films and video clips of a sexually explicit or arousing nature);
- a false and defamatory statement about any person or organisation;
- material which is offensive, obscene, criminal discriminatory, derogatory or may cause embarrassment to the CCG, our patients or our staff;
- confidential information about us or any of our employees or service users or patients (which you do not have express authority to disseminate);
- any other statement which is likely to create any liability (whether criminal or civil and whether for you or the CCG);
- material in breach of copyright or other intellectual property rights, or which invades the privacy of any person.

11.6 Where evidence of misuse is found, the CCG may undertake a more detailed investigation in accordance with the CCG's disciplinary procedure, involving the examination and disclosure of monitoring records to those nominated to undertake the investigation and any witnesses or managers involved in the investigation. If necessary such information may be handed to the police in connection with a criminal investigation.

11.7 If you notice any use of social media by other employees in breach of this policy please report it to your line manager.

12. Equality

12.1 The CCG is committed to:

- i) Eliminating discrimination and promoting equality and diversity in its policies, procedures and guidelines and;
- ii) The designing and implementing of services, policies and measures that meet the diverse needs of its population and workforce, ensuring that no individual or group is disadvantaged.

13. Social Media in the event of a major incident

13.1 Social media communication has advanced from its origins as a picture-sharing medium strictly used by young adults, to a comprehensive, informative, and responsive communication tool.

13.2 In the event of the CCG responding in to a major incident all staff are advised to seek advice from the Communications and Engagement team before uploading any posts related to the incident on their personal accounts.

13.3 It is vital staff do not share or divulge in any information that is confidential. If you need advice or are unsure, contact the Communications and Engagement team.

14 Monitoring and review of this policy

14.1 This policy shall be reviewed regularly to ensure that it meets legal requirements and reflects best practice.

INTEGRATED IMPACT ASSESSMENT

Policy/project/function/service	Social Media and Acceptable Computer Use Policy		
Date of analysis:	27/09/2019		
Type of analysis completed	Quality	X	
	Equality	X	
	Sustainability	X	
What are the aims and intended effects of this policy/project or function?	To help employees of North Lincolnshire Clinical Commissioning Group make decisions about the appropriate use of computer equipment, network services and the use of social media.		
Please list any other policies that are related to or referred to as part of this analysis			
Who does the policy, project, function or service affect?	Employees	X	
	Service users		
	Members of the public		
	Other (please list)		

QUALITY IMPACT

	Please 'X' ONE for each			Brief description of potential impact	Mitigation strategy and monitoring arrangements	Risk 5 x 5 risk matrix)	
	Chance of Impact on Indicator					Likelihood	Consequence
	Positive Impact	No Impact	Negative Impact				
	X	X	X				
PATIENT SAFETY							
Patient safety /adverse events		X					

Mortality position		X					
Infection control MRSA/CDIFF		X					
CQC status		X					
NHSLA / CNST		X					
Mandatory/statutory training		X					
Workforce (vacancy turnover absence)		X					
Safe environment		X					
Standard & suitability of equipment		X					
CLINICAL EFFECTIVENESS							
NICE Guidance and National Quality Standards, eg VTE, Stroke, Dementia		X					
Patient related outcome measures		X					
External accreditation e.g. professional bodies ie RCN		X					
CQUIN achievement		X					
PATIENT EXPERIENCE							
Will there be an impact on patient experience if so how		X					
Will it impact on carers if so how		X					
INEQUALITIES OF CARE							
Will it create / reduce variation in care provision?		X					
STAFF EXPERIENCE							

What is the impact on workforce capability care and skills?		X					
Will there be a change in working practice, if so, how?		X					
Will there be an impact on training		X					
TARGETS / PERFORMANCE							
Will it have an impact on performance, if so, how?		X					
Could it impact on the achievement of local, regional, national targets, if so, how?		X					
EQUALITY IMPACT							
Analysis Rating (see completion notes)	Red		Red/Amber		Amber		Green
Approved by:	Commissioner Lead:				GP lead for E&D:		
	Date				Date		
Local Profile Data							
General	N/A						
Gender (Men and Women)	N/A						
Race (All Racial Groups)	N/A						
Disability (Mental and Physical, Sensory Impairment, Autism, Mental Health Issues)	N/A						

Religion or Belief	N/A
Sexual Orientation (Heterosexual, Homosexual and Bisexual)	N/A
Pregnancy and Maternity	N/A
Transgender	N/A
Marital Status	N/A
Age	N/A
Equality Data	
Is any equality data available relating to the use or implementation of this policy, project or function?	N/A
List any consultation e.g. with employees, service users, Unions or members of the public that has taken place in the development or implementation of this policy, project or function.	N/A
Promoting inclusivity; How does the project, service or function contribute to our aims of eliminating discrimination and promoting equality and diversity?	N/A
Equality Impact Risk Assessment test	
What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by <i>The Equality Act 2010</i> ?	

Protected Characteristic:	No Impact	Positive Impact	Negative Impact	Evidence of impact and if applicable justification where a <i>Genuine Determining Reason</i> exists
Gender (Men and Women)	X			
Race (All Racial Groups)	X			
Disability (Mental and Physical, Sensory Impairment, Autism, Mental Health Issues)	X			
Religion or Belief	X			
Sexual Orientation (Heterosexual, Homosexual and Bisexual)	X			
Pregnancy and Maternity	X			
Transgender	X			
Marital Status	X			
Age	X			

Action Planning

As a result of performing this Equality Impact Analysis, what actions are proposed to remove or reduce any risks of adverse outcomes identified on employees, service users or other people who share characteristics protected by The Equality Act 2010?

Identified Risk:	Recommended Action:	Responsible Lead	Completion Date	Review Date

SUSTAINABILITY IMPACT

Staff preparing a Policy / Board Report / Committee Report / Service Plan / Project are required to complete a Sustainability Impact Assessment. Sustainability is one of the CCG's key Strategies and the CCG has made a corporate commitment to address the environmental effects of activities across its functions. The purpose of this Sustainability Impact Assessment is to record any positive or negative impacts that this activity is likely to have on each of the CCG's Sustainability Themes.

	Positive Impact	Negative Impact	No Specific Impact	What will the impact be? If the impact is negative, how can it be mitigated? (action)
Reduce Carbon Emission from buildings by 12.5% by 2010-11 then 30% by 2020			X	
New builds and refurbishments over £2million (capital costs) comply with BREEAM Healthcare requirements.			X	
Reduce the risk of pollution and avoid any breaches in legislation.			X	
Goods and services are procured more sustainability.			X	
Reduce carbon emissions from road vehicles.			X	
Reduce water consumption by 25% by 2020.			X	
Ensure legal compliance with waste legislation.			X	
Reduce the amount of waste produced by 5% by 2010 and by 25% by 2020			X	
Increase the amount of waste being recycled to 40%.			X	
Sustainability training and communications for employees.			X	

Partnership working with local groups and organisations to support sustainable development.			X	
Financial aspects of sustainable development are considered in line with policy requirements and commitments.			X	