



SOCIAL MEDIA POLICY

Links

The following documents are closely associated with this policy:

- Information Sharing Policy
- Confidentiality Code of Conduct
- Code of Business Conduct
- Disciplinary Policy and Procedure
- Dignity and Respect at Work Policy
- Health and Safety Policy
- Equal Opportunity Policy
- Freedom to Speak Up Policy
- IM&T Security Policy
- Display Screen Equipment (DSE) Procedure
- Communications and Strategy
- Information Governance Strategy
- Information Governance Policy
- Relationships at Work Policy

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Version	Date Approved	Publication Date	Approved By	Summary of Changes
1.0	8 April 2014	8 April 2014	Quality and Governance Committee	New Policy for EMAS Trust
2.0	19 April 2016	28 April 2016	Quality and Governance Committee	Full Review. <ul style="list-style-type: none"> Update of job titles and directorate names to reflect changes made since policy was created in 2014. Addition of new information highlighting developments in social media e.g. addition of 'vlogging' section. Amendment clarifying social media can now be accessed via EMAS devices, reflecting a change in approach at the service last year
3.0	15 May 2018	26 June 2018	Quality and Governance Committee	Update of job titles and directorate name to reflect changes made. Introduction of key principles to give clear guidance for staff and volunteers on their legal and professional duties. Following recent cyber-attacks on the NHS access to social media sites has been restricted. All trust laptops have access to Twitter and YouTube but access to Facebook is granted on a case by case basis.
3.1	18 April 2019	26 April 2019	Workforce Committee	Three-month extension to the review date

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4.0	22 August 2019	9 September 2019	Workforce Committee	<p>Update of job titles and directorate name to reflect changes made. Addition of new information addressing developments in social media, including sharing or retweeting material and membership of open, closed and private groups.</p> <p>Additional clarity on reasonable prevention of identification on social media following national discussions.</p> <p>Following an increase in request for corporate accounts, addition of expectations for those account holders as a representative of the organisation.</p> <p>Addition of 'Personal Responsibility' section at the beginning of the document.</p>
5.0	27 May 2020	2 June 2020	Information Governance Group	<p>Update to job titles and directorate name to reflect changes made.</p> <p>Addition of corporate Instagram account.</p> <p>Updates to address developments in social media including the challenging of misinformation, blocking of users and using 'check-in' features on social media platforms.</p> <p>Addition of new social media platform 'TikTok'.</p> <p>Addition of images reflecting social distancing and government advice to support COVID-19 pandemic.</p> <p>Inclusion of an accessibility section to the policy.</p> <p>Addition of Appendix 3 – Handling inappropriate social media use by patients and the public.</p>
5.1	04 March 2021		Urgent Approval process pending ratification at Information Governance Group	<p>Addition of point regarding contact from patients via social media requested by Coroner following an inquest involving a PAS member of staff.</p>

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6.0			Information Governance Group	<p>Addition of actions required by a corporate Twitter account holder if leaving the organisation or no longer wishing to have a corporate account.</p> <p>Addition of guidance relating to closed and private social media groups.</p> <p>Addition of guidance relating to misrepresentation of old or outdated information.</p> <p>Addition of Getty Images.</p> <p>Addition of Snapchat</p>
7.0	19 May 2022	23 May 2022	Information Governance Group	<p>Addition of clarity around Workplace not being covered by the social media policy.</p> <p>Clarity on data risks of having a group on a Facebook platform.</p>
8.0	18 May 2023	25 May 2023	Information Governance Group	<p>Addition referring to not sharing petitions on work-related complaints and concerns if profile is identifiable as belonging to a staff member.</p>

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Appendix 1 – Dissemination Plan

Appendix 2 – Quick reference guide for staff using social media

Appendix 3 – Managing inappropriate social media use by patients and the public

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Your Personal Responsibility

All employees who choose to use social media either in a corporate or personal capacity are solely responsible for what is posted on their accounts.

Therefore, employees must also be aware of the consequences of posting contrary to the advice included in this social media policy.

In the most serious circumstances this may include civil or criminal legal action. This may include, but is not limited to, if the individual posts libellous or defamatory information online ([Defamation Act 2013](#)), incites others to commit a crime ([Malicious Communications Act 1988](#)), illegally uses copyrighted material ([Copyright Designs and Patents Act 1988](#)), or are in [contempt of court](#) by commenting on an active court case ([Contempt of Court Act 1981](#)).

Employees should note that any breaches of the EMAS Social Media policy may lead to disciplinary action. Serious breaches of this policy, for example incidents of bullying of colleagues or social media activity causing serious damage to individuals and the organisation may constitute gross misconduct and lead to dismissal in line with the EMAS Disciplinary Procedure.

Registered clinicians are advised that they may put their registration at risk if they post inappropriate information on social networking sites.

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1. Introduction

- 1.1. East Midlands Ambulance Service (EMAS) recognises that social media sites give the organisation an opportunity to communicate timely and relevant information, including imagery and video, to challenge the spread of misinformation to a wide audience (regional, national and international) and to engage with patients, stakeholders and staff.
- 1.2. We also recognise that using social media can present significant risk both to the organisation and to individual staff members or EMAS volunteers. Risks include reputational damage and acts such as defamation, breach of confidentiality or copyright infringement.
- 1.3. EMAS does not allow the majority of staff access to social media sites from their work devices. However, social media is used in a personal capacity by a large section of our workforce and the lines between personal and professional conduct in relation to social media are often blurred. This policy provides clear guidance for individual staff members and volunteers e.g. community first responders, on their use of social media. This policy is not intended to restrict employees from using social media sites for personal use, but to make them aware of the risks they could potentially face when sharing information about their professional and personal life. The policy will assist staff and volunteers in staying safe online, being a responsible digital professional and avoiding dialogue, comments or material which may contravene EMAS' Code of Business Conduct.
- 1.4. EMAS has introduced Workplace by Meta to provide staff with a safe and digitally-secure platform for professional use which can be kept separate from personal social media profiles to benefit staff wellbeing. EMAS Workplace is an internal engagement platform, not a social media platform, and therefore is not covered by this Social Media Policy. EMAS Workplace is covered by other relevant EMAS policies.
- 1.5. It is important that we are able to use these technologies and services effectively, but this should be balanced with protecting professional integrity and reputation of both the individual and EMAS, as well as the wider NHS.

2. Objectives

The objectives of this policy are:

- 2.1 To set out principles for employees, contractors and volunteers to adhere to when using social media sites and associated tools. EMAS recognises that staff may wish to and do engage in social media. The policy is not meant to deter employees from using social media sites but, is intended to help protect employees and prevent them from bringing EMAS and the NHS into disrepute either inadvertently or intentionally. The policy specifies the potential consequences of any actions which contravene these principles.
- 2.2 To offer staff, contractors and volunteers guidance on acceptable use of social

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media from both workplace and private computers and mobile devices, in line with existing policies such as EMAS' Code of Conduct and Confidentiality Code of Conduct. This aims to assist staff to protect patients and avoid exposing themselves, EMAS, the NHS or their profession to risk.

2.3 To bring together legislation and national advice to give clear rules on how to manage your social media account and protect yourself, your patients, your profession and your colleagues.

3. Scope

3.1 This policy applies to all EMAS employees (permanent, temporary, bank, contractors), volunteers, agency workers and students whilst on placement with the service.

3.2 The policy is not intended to stop individuals from using social media sites in their own time, but to protect them, the organisation and the people we care for whilst outlining some areas of best practice and illustrate where problems can arise for individuals and the service.

4. Definitions

4.1. **Social Media** is the collective name for websites, including mobile phone and online applications, which enable content including messages, opinions, images and videos to be shared within an online (digital) community. Non-exhaustive examples are Facebook, Instagram, YouTube, Twitter, LinkedIn, WhatsApp, Snapchat and TikTok. Social media does not include Workplace by Meta as that is an internal engagement platform and is not available to anyone external to EMAS.

4.2. **Official EMAS accounts** are set up and managed by the Communications team. A select group of advocates are delegated responsibility by the Communications team to tweet from a work twitter account. Corporate approved accounts have @EMAS_ in the username.

5. Responsibilities

5.1. Communications team

5.1.1 The EMAS Communications team is responsible for:

- Managing and monitoring EMAS corporate presence on social media sites and ensuring such activity delivers against the aims of the Communications Strategy.
- Managing EMAS' reputation in the traditional media and with key stakeholders. This role includes digital communications and social media.
- Training EMAS-approved social media users and monitoring corporate

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accounts to ensure they adhere to this policy.

- Using the authority to speak on behalf of EMAS and manage all corporate social media accounts.

5.2. Corporate account users

5.2.1 Approved users of EMAS accounts – people who have completed EMAS corporate social media training - must adhere to the EMAS Social Media Policy and actively engage with the account and its followers by making sure they post regularly and respond to messages.

5.3. Community Response team

5.3.1. The Community Response team is responsible for ensuring all community first responders are aware of the EMAS Social Media Policy and that they adhere to it.

5.4. Operational and clinical managers

5.4.1. Operational and clinical managers are responsible for ensuring clinical students and agency workers on placement are aware of the EMAS Social Media Policy and that they adhere to it.

5.5. All EMAS staff and volunteers

5.5.1. Colleagues, volunteers and students must use social media appropriately by adhering to this policy. It is the individual responsibility of the user of social media to ensure the information they are posting is accurate, suitable and consistent and will not contravene legal obligations of confidentiality or damage the reputation of the organisation or their profession.

5.5.2. The relevant line manager must be notified of any inappropriate use of social media. The line manager must then report it to the Assistant Director of Communications immediately, who will review the reported post or message and take appropriate action on the relevant social media site where required. The line manager will also speak to the individual involved and escalate to Human Resources if required.

5.5.3. If a member of staff is contacted by a patient or patient's relative/guardian/carer wanting to convey a complaint or compliment, to report a lost or found item, or to request a reunion, the member of staff should thank them for getting in contact and must direct them to the [EMAS Patient Advice and Liaison Service \(PALS\)](#). For guidance on what to do if a staff member is contacted by a patient or patient's relative/guardian/carer regarding any other matter or if the conversation develops via social media, please refer to [Section 6 of the EMAS Relationships at Work Policy](#).

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6. Key principles

6.1. Social Media accounts

- 6.1.1. All official EMAS pages or accounts online, including social media sites, will be created, managed and maintained by the Communications team. This will ensure adherence to corporate design (NHS Identity Policy and EMAS Corporate Style Guide) and compliance with relevant policies and legislation.
- 6.1.2. The team will regularly monitor these and other social media sites where EMAS is mentioned and where necessary escalate information to the relevant Executive Directors. This will allow the organisation to benefit from insight gathered online and ensure any appropriate action can be taken, including progressing proactive engagement.
- 6.1.3. To ensure the EMAS corporate social media accounts remain trusted sources of information for the public and our staff, the Communications team will ensure that information included in posts or replies to other users is factual, open and transparent, and in line with information and replies shared using other communication methods.
- 6.1.4. Wherever possible, the Communications team will use EMAS' corporate profile on sites such as Twitter to directly challenge those who publish misleading information and to ask that inaccuracies are corrected. Where necessary, the Communications team will use the corporate social media accounts to share corporate statements in posts and comments to maintain balance and establish truth.
- 6.1.5. The key principles apply to all staff, volunteers and agency workers and cover all social media activity including Community First Responder charity accounts when sharing content about their voluntary role with EMAS including open, closed and private Facebook groups and online blogs and videos.
- 6.1.6. When a member of staff identifies that they work for EMAS through words, pictures or videos and/or discusses their work on a social networking site, they must behave professionally and in a way that respects confidentiality, and protects patients, members of the public, work colleagues, their profession's credibility and the reputation of East Midlands Ambulance Service and the wider NHS.
- 6.1.7. Even if a staff member does not directly associate themselves with EMAS or the ambulance service/NHS, their link with the organisation can become known through images on friends' sites, being tagged in posts by friends, via the EMAS website, or by someone searching for names via internet search engines.
- 6.1.8. All staff and volunteers working on behalf of EMAS have a responsibility to maintain public confidence in their ability to safeguard patients' welfare and information, and to behave in the best interests of the patients and EMAS.

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6.1.9. When using any form of social media, and whether they choose to identify themselves as working for EMAS or not, all staff must follow the principles outlined below.

6.2. Corporate use of social media

6.2.1. EMAS is committed to using social media to advance the aims of its Communications Strategy. This includes promoting our vision and values and sharing our plans and involving communities and individuals in our service development.

6.2.2. EMAS will manage a presence on key social media sites such as Twitter, Facebook, Instagram and YouTube to engage with patients, carers, the public, media and other stakeholders. This includes an ongoing commitment to ensuring it uses the most appropriate social media sites to reach stakeholders, including seldom-heard groups.

6.2.3. To help reach a currently under-engaged group of online users, a corporate Instagram account was launched in 2020 and is managed by the Communications team. Additional corporate Instagram accounts will not be permitted for the first two years of this account to support the growth of the account's following in line with the Communications Strategy 2020-2022. Instead colleagues will be encouraged and supported to submit material for use with credit on the corporate account.

6.2.4. The Communications team will work to increase accessibility of our corporate social media accounts, including using alternative text for images, and CamelCase (where the first letter of each word is capitalised) in hashtags, in line with information from the Royal National Institute for the Blind: <https://www.rnib.org.uk/rnibconnect/technology/making-your-social-media-accessible>. This will support our equality and diversity work as CamelCase aids people who use software to read out text.

6.3. Empowering advocates

6.3.1. The Communications team is committed to identifying and enabling members of staff (including volunteers) who can use social media to support corporate objectives. It aims to support and empower individuals to act as advocates for campaigns, appeals and EMAS' general business and to influence staff and the public to take action when required. Individuals will be selected to reflect the diversity of roles within EMAS.

6.3.2. Advocate accounts on all social media platforms should not be relied upon as the sole method to share news or advertise events as it is recognised that some staff members choose not to use social media. Other channels such as Enews, EMAS Workplace, email and meetings should be utilised alongside social media to share information with staff.

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- 6.3.3. Corporate tweeters will be selected by the Communications team and undergo a training course outlining the expectations of a corporate tweeter. Team Twitter accounts must only be accessed and run by individuals who have undergone a training course outlining the expectations of a corporate tweeter. The Communications Team will retain a secure, password-protected log of all social media passwords including for accounts belonging to corporate tweeters, and any changes to these passwords must be reported to the Communications Team immediately. A log will also be kept by the Communications Team which details when an account belonging to a corporate tweeter has been accessed, including the date, reason, and time the account was accessed and exited.
- 6.3.4. Corporate tweeters must take care in only retweeting and liking posts from reputable sources and which are in line with EMAS values and the other key principles outlined in this policy.
- 6.3.5. Corporate tweeters must tweet regularly and reply to messages and tweets promptly. If a corporate tweeter has not posted for four weeks, the Communications team will contact the account owner to offer support. If the corporate tweeter does not begin to post regularly within the four weeks following this contact, the account will be closed by the Communications team and the owner will be unable to apply for another corporate account for 12 months.
- 6.3.6. In the event that a corporate tweeter no longer wishes to have an account, or leaves the organisation, they must notify the Communications team as soon as possible and provide a date when they will delete their corporate Twitter account. The corporate account must then be deleted by the user on the agreed day or it will be closed by the Communications team. It is not permitted to convert an EMAS corporate account to a personal account or alternative organisational account to prevent any misconception that future posts are still from an EMAS-endorsed corporate account.
- 6.3.7. Advocates on all social media platforms, including Twitter, must respect the decisions of the corporate Communications team as final and to take any actions requested by the Communications team (including, but not restricted to, removing posts or posting explanations or comments). In the event that the individual appeals this process, we will engage with the relevant department manager, the relevant executive director and Human Resources to determine the right course of action with the reputation of the organisation, individual, and the profession they represent at the heart of that decision-making process.
- 6.3.8. Staff who are interested in becoming a corporate tweeter should email their name, job role and reasons for wanting an account to: Communications@emas.nhs.uk. As part of the application process to become a corporate tweeter, staff will need to obtain written support from their line manager, and will need to complete a short scoping exercise to evidence how they would use the account, and the value it would add to the Communications Strategy at EMAS. If this is successful, they will need to complete a social media training session run by the Communications Team before they can be allocated a

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corporate account Twitter name.

6.4. Using EMAS' name and branding in your personal account

- 6.4.1. The NHS and EMAS logo, images on the EMAS website and corporate branding are the property of the organisation and are subject to copyright. These must not be used unless consent is given from the EMAS Communications team.
- 6.4.2. Employees are allowed to say they work for EMAS, which recognises that it is natural for staff sometimes to want to discuss their work on social media, however their profile must include **'these views are my own, not of my employer.'**
- 6.4.3. Only corporate social media accounts may include "EMAS" in their username. If a social media account is identified as including EMAS in the username or pertaining to be speaking on behalf of the organisation, the Communications team will ask the owner to close it or change the username and profile details as agreed through direct dialogue. In the event that the owner refuses to close the account, the Communications team will work directly with the social media company to have the account forcibly closed.

6.5. Make it clear opinions are your own in personal accounts

- 6.5.1. If a staff member identifies themselves as an EMAS employee or is linked by association, they must maintain their professional status in a digital capacity and present themselves in line with EMAS values. This includes, but is not restricted to, what they post, comment, share or retweet, and which groups they belong to.
- 6.5.2. Staff are not authorised to speak on behalf of EMAS. Your opinions online are your own and you must make it clear in your profile by including **'these views are my own, not of my employer'**.
- 6.5.3. However, the use of a disclaimer does not override the need to follow other principles in this policy and does not eliminate the possibility of disciplinary.

6.6. Protect your digital footprint

- 6.6.1. Staff should review their privacy settings to protect access to their personal information.
- 6.6.2. Staff are advised to apply approval settings to posts they are tagged in on their personal social media accounts to ensure they are aware of all material appearing on their social media accounts.

6.7. Be aware, online posts can become public

- 6.7.1. Staff must be aware of privacy limitations on social media regardless of 'privacy' settings and the intended audience. Whatever is posted on social media, even in a private or closed group with controlled membership or in a private Whatsapp

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group, or if it's a 'direct' or 'private' message can be shared with wider audiences or put into the public domain without their permission. For example, via a screen shot image published on social media, emailed to a contact, or even shared with law enforcement or used as evidence in a court of law. Staff must assume anything posted can be seen by anyone without their permission or knowledge.

6.7.2. Staff should be aware that legal ownership of content on many social media sites exists not with the account holder, but with the site owner; this includes text, photographs, videos, etc. The social media provider may use your data, information and posts for other purposes. All users are advised to verify Terms of Use for each social media platform. By registering for their services you are deemed to be in agreement with their Terms of Use.

6.8. Ensure comments are legal

6.8.1. All comments must be legal and must not incite people to commit a crime. Staff must be aware that comments on social media sites are still covered by British Law, even if posted under a pseudonym. Comments can still result in legal action in line with the Malicious Communications Act 1988.

6.8.2. The requirements of the Data Protection Act 2018, General Data Protection Regulation 2016 and the Caldicott Principles 2013 must be adhered to at all times. You can review the Caldicott Review, 'Information: To Share Or Not To Share? The Information Review', April 2013 by visiting: www.gov.uk/government/publications/the-information-governance-review

6.8.3. Staff must not comment on crime scenes and must be aware of legislation including the Contempt of Court Act 1981, which legislates against discussion which could prejudice legal proceedings.

6.8.4. Protect confidentiality at all times

6.8.5. Confidentiality must be protected at all times and under no circumstances should content be posted that identifies a patient without their written and informed consent. Staff must ensure they know and follow EMAS' policy on confidentiality.

6.8.6. The Communications team is responsible for obtaining the necessary consent from patients before sharing audio, images or information on the official EMAS social media accounts, and for initially challenging any incorrect copyright claims against the organisation. Consent must be informed and explicit and the individual advised that once the information is on social media it is in the wider public domain and may become the property of the social media company.

6.8.7. In line with guidance from the Health Care Professions Council (HCPC) and Nursing and Midwifery Council (NMC) paramedics, nurses and assistant ambulance personnel are trusted professionals and releasing patient identifiable information, or causing a patient to fear they may be identified is illegal and unethical and may lead to regulatory action.

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6.8.8. Breaching confidentiality includes revealing information owned by the organisation; giving away confidential information about an individual (such as a colleague or patient) or organisation connected to EMAS; or discussing the organisation's internal workings (such as future business plans that have not been communicated to the public).

6.8.9. A breach of confidentiality may lead to a compensation claim by an individual who has been the subject of a breach of confidentiality and has suffered damage – whether financial in nature or due to emotional distress. In the event this breach of confidentiality was posted on a corporate account, EMAS would be liable for this compensation. However, if it was posted on a public page by an EMAS staff member then the individual staff member would be liable to pay this compensation.

6.9. Indirect breaches of confidentiality

6.9.1. Staff must not comment on, or provide additional information about, cases already in the public eye – for example any incident responded to by EMAS that is being reported by media. If staff wish to share additional information publicly they must contact the Communications team.

6.9.2. Staff must not use live streaming on any social media platform while at work under any circumstances without written permission from the Communications team.

6.9.3. While sharing one piece of information may not breach confidentiality the sum of the information shared in the public domain may lead to a patient being identified. Staff must take this into account when posting on social media.

6.9.4. Staff must be aware of geo-location tagging on any posts they share on social media and take steps to prevent sharing this information. Geo-location is where the post includes data around where a photo was taken, or a post was shared, and may identify the location of a patient or their address.

6.9.5. Staff must not use the 'check-in' feature on any social media platform while attending a patient or an incident as this could identify the location of a patient or their address.

6.9.6. Staff must not use their personal social media accounts to contact a patient or relative. If staff feel the need to make contact they must contact the Communications team who will, if appropriate, approach the patient or relative on their behalf.

6.10. Be careful when talking about work issues

6.10.1. Staff must only share information about EMAS that is already in the public domain and must not add potentially derogatory or inflammatory comments on these issues. This includes starting or sharing petitions on work-related issues if their social media account is identifiable as belonging to an EMAS staff member.

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- 6.10.2. Staff must not post information about their working day that may lead to a patient being identified, their professionalism being questioned or bring EMAS into disrepute. This includes naming and making derogatory comments about others, including but not limited to; members of the public, colleagues, managers, volunteers, or partner organisations, and could result in disciplinary action.
- 6.10.3. Social media is not the place to break news about human resource matters, funding, new employments or posts becoming vacant unless authorised by the EMAS Communications team. Ask permission before sharing anything that could reasonably be considered private or internal to the organisation.
- 6.10.4. Staff must not share a post or image relating to EMAS from a private or closed group to their own personal account or another group without written permission from the original poster and only if the content adheres to the EMAS Social Media Policy.
- 6.10.5. Staff must not share old images, social media posts, or news articles and falsely claim or insinuate that these are recently taken or posted. This is to ensure factual clarity for the reader, and to protect EMAS' reputation and that of the colleagues involved, and the trust placed in our organisation and profession by the public.
- 6.10.6. If a member of staff is contacted by the media about something they have shared about EMAS to request other information or an interview, they must contact the Communications team for advice immediately.
- 6.11. **Using images and video**
 - 6.11.1. If staff choose to post images of themselves or colleagues in uniform, or in an identifiable work setting, they must ensure that they represent a professional image of EMAS and are adhering to the uniform policy – particularly pertaining to being bare below the elbows.
 - 6.11.2. Staff must not post images or any information containing patient identifiable details. This includes but is not limited to; an ECG, a photograph outside a patient's house/on their road, or a photograph taken in the Emergency Operations Centre including a computer screen which displays patient identifiable information, or within an Emergency Department or other department / ward at a hospital location.
 - 6.11.3. Staff must ensure that any posted images conform to current government and NHS England advice on social distancing, Personal Protective Equipment such as facemasks, or any other social interaction requirements which may be applicable at the time of posting. When posting images taken at a time before such current government advice was implemented, this should be made clear in text accompanying the image, especially if the staff member is in uniform or in an identifiable work setting.
 - 6.11.4. Staff must not post copyrighted images, this includes images from the internet

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and someone else's photographs. The Communications Team have access to Getty Images and can assist in providing images if requested via communications@emas.nhs.uk.

6.11.5. Staff are encouraged to retweet and share posts made by the corporate accounts. However, images and video must not be copied from these accounts and used without permission from the Communications team as they may be subject to copyright where the usage agreement only extends to the corporate account (eg images from Getty Images purchased by the Communications team).

6.12. **Respect others**

6.12.1. Staff must not post anything contrary to EMAS' policies, or do anything that could be considered discriminatory against, or bullying or harassment of, any individual, for example by making potentially offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age.

6.12.2. Staff must not belong to any social media groups or follow any social media accounts which that incite or promote violence or discrimination against, or bullying or harassment of, any individual, for example by making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age. This includes social media groups that are open, closed or private.

6.12.3. Staff who identify as working for EMAS must check the groups they belong to and the accounts they follow on social media platforms to ensure they are not supporting anything contrary to EMAS' policies or EMAS' values (eg groups such as Britain First or the English Defence League)

6.12.4. Staff must seek permission from colleagues before posting personal details or images that may link with them with EMAS.

6.12.5. Any member of staff who is targeted online by trolling, abusive or persistent and unwanted contact, or messaging in relation to their job role or the organisation, whether on a corporate account, a corporate advocate account or on their own personal account, can contact the Communications team for advice and support. Appendix 3 – Managing inappropriate social media use by patients or the public – has been developed to support with these incidents.

7. **Staff using social media from personal computers and mobile devices**

7.1. **Confidentiality Code of Conduct and other policies**

7.1.1. Access to Twitter and YouTube is allowed from the EMAS network in line with the organisation's Confidentiality Code of Conduct.

7.1.2. User access to Facebook and Instagram is restricted and reviewed on a case by case basis due to the increased security risk.

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- 7.1.3. However, as the Confidentiality Code of Conduct states, staff using these sites from personal computers and mobile devices must be aware that they still have a duty of confidentiality to EMAS and other service users.
- 7.1.4. Staff must be aware that comments made on social media sites are public and searchable even if they are deleted. They must not share information which puts patient confidentiality at risk or which could bring the organisation, the NHS, or their profession, into disrepute.
- 7.1.5. The Code of Business Conduct advises staff against language or behaviour which is potentially offensive, discriminatory or obscene and this applies to staff's online activities.
- 7.1.6. Staff must also be aware that if they identify themselves publicly as an EMAS' employee they must be vigilant against acts of fraud or crime. For example, against online approaches to establish where drugs are located. Local Security Management Specialists can provide advice on staying safe online.
- 7.1.7. All content posted by an individual staff member is their sole responsibility.
- 7.1.8. EMAS has a Freedom to Speak Up Policy to assist staff who wish to make declarations which they believe are in the public interest. Social media must not be used to raise concerns about EMAS' activities.

7.2. Trade Unions

- 7.2.1. EMAS' agreement with staffside recognises that union representatives may wish to use social media to network with EMAS staff. The freedom of staff to associate and discuss union business online is respected (as outlined in Article 11 of the Human Rights Act 1998) however, staff doing so must still follow EMAS' Code of Conduct in addition to any social media guidance offered by their union or professional organisation.
- 7.2.2. Staff and union groups may not use EMAS' name, logo or associated branding without prior written permission from the Communications team.

8. Disciplinary action

- 8.1. All employees and volunteers are required to adhere to this policy. Employees should note that any breaches of this policy may lead to disciplinary action. Serious breaches of this policy, for example incidents of bullying of colleagues or social media activity causing serious damage to the organisation, may constitute gross misconduct and lead to dismissal in line with the EMAS Disciplinary Policy and Procedure.
- 8.2. Registered clinicians are advised that they may jeopardise their clinical registration if they post inappropriate information on social networking sites.

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9. Consultation

- 9.1. The development of this policy was led by the Senior Communications Officer, supported by the Assistant Director of Communications at the time. This version has been updated by the Communications Manager and the Assistant Director of Communications. Frontline, support services, managers responsible for other EMAS policies and Trade Union representatives received a draft copy of this policy and views were collected about any additions or changes that were required.

10. Monitoring compliance and effectiveness of the policy

- 10.1. This policy will be monitored and reviewed as an appendix to the Communications and Engagement Strategy. It will be reviewed annually to respond to the changing social media landscape.
- 10.2. Approval of this policy will be via the Information Governance Group, to whom an annual report will be provided detailing any issues which have arisen during the preceding 12-month period through the use of social media.

11. Additional Information

- 11.1. The Health and Care Professions Council (HCPC) have published guidance which can be accessed here: <https://www.hcpc-uk.org/registrants/socialmediaguidance/>
- 11.2. The Nursing and Midwifery Council have published guidance which can be accessed here: <https://www.nmc.org.uk/standards/guidance/social-media-guidance/read-social-media-guidance-online/>
- 11.3. Any staff who are in any doubt about what they should or should not post on social media sites, or who discover online content that may harm the reputation of the service, must contact the Communications team by email: communications@emas.nhs.uk or by calling the on-call Communications team member listed on the EMAS website: <https://www.emas.nhs.uk/news/media-enquiries/> . The call will be taken in the strictest of confidence.

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Plan for Dissemination of Procedural Document

This plan must be completed for all procedural documents

Title of document:	Social Media Policy		
Version Number:	8.0	Dissemination lead: Print name, title and contact details	Elizabeth Fry, Communications Manager Tel: 07966 521284 Email: Elizabeth.Fry@emas.nhs.uk
Previous document already being used?	Yes		
Reading Categories <i>The Policy Reading Matrix helps staff identify which documents they must read dependent upon their role. Does the document need to be included on the Policy Reading Matrix as essential reading for certain staffing groups?</i>			Yes
			No
Essential Reading	To all EMAS staff and volunteers, including everyone on the staffing groups list.		
Awareness for Reference Purposes			
As part of the dissemination process, who does the document need to be disseminated to?	To all EMAS staff and volunteers.		
Proposed methods of dissemination: Including who will disseminate and when Some examples of methods of disseminating information on procedural documents include:	Promotion of policy via <ul style="list-style-type: none"> • Regular articles in weekly online newsletter Enews (received by staff and volunteers) • Insite • Workplace by Meta • Virtual Conversation Café <p>Any questions or requests for advice or clarification can be sent to communications@emas.nhs.uk or directly to Elizabeth Fry using the details above as person responsible for the implementation process.</p>		
Summary for inclusion on the iEMAS section of the JRCALC Plus application	Not applicable		
Key Words associated with the document (to aid searches on Insite)	Twitter, Facebook, Instagram, TikTok, YouTube, LinkedIn, Snapchat, WhatsApp.		

Do	Don't
<p>Check your privacy settings, can someone search your name and have access to your online footprint?</p> <p>Review privacy settings on relevant social media sites.</p>	<p>You mustn't provide a commentary of jobs you attend. The public are interested in what we do but that has to be balanced against protecting a patient's right to privacy.</p> <p>Think, what does this achieve? Public awareness, education and engagement can be achieved in better ways than just documenting incidents (broadcast style rather than engagement and involvement).</p>
<p>Make it your priority to protect patient confidentiality at all times.</p>	<p>It may be appropriate to post something after a job if it provides insight into your role, skillset or profession.</p> <p>Do not give information about a patient's gender or age. You may specify child or adult.</p> <p>Do not give a location, note community first responders (CFR) are at higher risk. If you are a CFR scheme, the location you are working in, and therefore the area where the patient is located, is already accessible to people.</p>
<p>Support EMAS campaigns ie #MakeTheRight999Call and #EMAZING, share good news and celebrate your colleagues.</p>	<p>You are not the voice of EMAS. If someone complains, shares a view about EMAS let the corporate channels provide the official response.</p>
<p>Social media is public. Only share information that you, as a professional would be happy to say, live, in uniform on BBC evening news.</p>	<p>It isn't your role to break news about EMAS vacancies, funding, or Human Resources matters etc. Ask permission before sharing anything that could reasonably be considered private or internal to the organisation.</p>
<p>Be clear in your biography that the views posted are yours.</p> <p>Include 'These views are my own'.</p>	<p>Refrain from discussing online scenes of crime or any incident which may be subject to legal proceedings. The Contempt of Court Act 1981 legislates against any person publishing information which may prejudice the legal process.</p>
<p>Maintain appropriate professional boundaries and make sure interaction with service users is safe and appropriate. The best way to communicate with patients is via the corporate Communications team.</p>	<p>Staff using social media must be aware of EMAS' Code of Conduct. Staff must not post threatening, offensive, discriminatory, vulgar or obscene content or imagery and must not encourage behaviour that could be linked to safeguarding issues for example, bullying, luring and exploitation, encouraging self harm or violence, and glorifying activities such as excessive drinking or drug taking.</p>
<p>Contact the EMAS communications team if you have any questions about the guidance. Out of hours contact details can be found at https://www.emas.nhs.uk/news/media-enquiries/</p>	

Appendix 3 – Managing inappropriate use of social media by patients and the public

This information is also published on our website and our social media profiles to establish behavioural expectations. The following applies to corporate and advocate accounts, and staff will be supported following these guidelines if the inappropriate use is pertaining to their personal account.

We recognise that social media has an important part to play in communicating and engaging with our patients, their families and the public, and for some this is their preferred method of communication.

We acknowledge that everyone has a legal right to freedom of speech, in line with other UK laws such as the Communications Act, Computer Misuse Act, Defamation Act and the Contempt of Court Act.

There will be times that patients, their families or the public are unhappy with their treatment or the actions of the organisation. Equally, from the hundreds of compliments received and the clinical outcomes achieved, we know that lives are being saved and what we do is valued by our communities. We encourage discussions and engagement on social media, offer the opportunity to leave reviews or make comments on our social media sites, and signpost to our formal complaints process via our Patient Advice and Liaison Service where necessary.

However, we also have a duty of care to our members of staff.

Therefore, we reserve the right to take action on social media posts, comments or messages that are:

- Abusive
- Harassing
- Threatening
- Racist, sexist, or homophobic including the use of language, swear words or words intended to cause fear or harm.
- Defamatory or libellous
- In contempt of court, break any other law, or incite others to break law(s)
- Spam
- Featuring inappropriate images or video

In the first instance, the Communications team will report and/or hide or delete the posts and, if necessary, will issue a warning to the author via direct message or email.

If inappropriate or persistent contact from the author continues, the Communications team will contact the frequent caller and safeguarding team for advice and support, particularly if it is suspected that the individual has mental ill health. This may result in a tailored response being created to provide to the author.

If, despite a warning being issued, the person continues to make inappropriate or persistent contact, the Communications team may take the decision to block the user from the corporate page. This decision must be taken by the assistant director of communications.

If this decision is taken, a message explaining the reasons for this decision will be sent to the person via direct message or email. A message will also be circulated to all corporate tweeters alerting them to this action so that they are empowered to block the individual if they begin targeting other EMAS accounts.

We may also report the issue to the police if it amounts to abuse, harassment, or if a criminal offence is suspected to have been committed.

We also reserve the right to take legal action in the case of libellous or defamatory material.