

Social Media Policy

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Author (name):	Caroline Swaby
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Two	Wholly revised and additional appendix	Sept 2015	Wholly revised and additional appendix
Three	Complete review	Nov 2016	Complete review and restructure with additional guidance on staff groups and groups involving patients.

Equality Impact

Bolton NHS Foundation Trust strives to ensure equality of opportunity for all service users, local people and the workforce. As an employer and a provider of healthcare Bolton NHS FT aims to ensure that none are placed at a disadvantage as a result of its policies and procedures. This document has therefore been equality impact assessed to ensure fairness and consistency for all those covered by it regardless of their individuality. The results are shown in the Equality Impact Assessment (EIA).

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1. Introduction

Social media builds virtual communities with shared interests and has many benefits, including interactive and responsive two way communication, speed of messaging, low or no cost, and accessible to many. For organisations it is a powerful marketing tool for attracting customers, building reputations and giving speedy information. For individuals it is a tool for learning and sharing, making and keeping in touch with friends, and giving views.

2. Purpose

This policy outlines the way in which the Trust uses social media and gives guidance to the organisation and its staff in order to maximise the benefits of social media. The policy also outlines the Trust's position with regards to the use of social media by members of the public whilst on Trust property.

3. Trust corporate accounts

3.1 The Trust has accounts managed by the Communications Department on Twitter, Facebook, LinkedIn, and YouTube. Accounts on other channels may be created as required. The Trust will use the corporate accounts to:

- build further awareness and the reputation of the Trust
- support local and national health related campaigns
- support Trust campaigns such as flu vaccination and recruitment
- influence beyond traditional audiences
- build stronger engagement
- improve the delivery of our services
- deliver fast and responsive communication, including at times of urgent need, e.g. major incidents
- provide additional channels to demonstrate good practice.

3.2 Members of staff can contact the Communications Department if they wish to highlight a service development, news etc. via social media or other channels.

3.3 Individuals may be given access to corporate accounts in the interests of the organisation providing they adhere to Trust guidance regarding use of the account.

3.4 Content delivered by the Trust on social media includes, but is not limited to:

- links to news releases, blog posts and videos
- interesting facts, quotes or observations related to our work
- topical questions related to our work intended to encourage discussion.

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- 3.5 Official Trust news will primarily be communicated through more traditional channels: official publications and statements on our website, speeches, and media releases. Social media posts may be used by the Communications Department to complement these channels. **Any Trust news or announcements which the Communications Department would normally publicise via a press release, must not be announced by staff on social media.**
- 3.6 **Urgent and important out of hours communications that need to be given via social media should be flagged up to the Tier One on call manager to decide whether to contact a member of the communications team via switchboard.**
- 3.7 Staff are encouraged to retweet, favourite or share Trust corporate messages and good news stories via their personal social media accounts.
- 3.8 The Communications Department commits to updating and monitoring our social media accounts during regular office hours, Monday to Friday 9a.m. - 5p.m. We will read all comments and messages sent to the Trust corporate accounts and will respond to them as appropriate.

4. General guidance on use of social media

- 4.1 The Trust recognises the benefits that social media can bring through sharing knowledge and information and relevant interactions. There are, however, risks to both organisations and individuals in using social media and care should be taken to avoid:
- bringing the Trust into disrepute
 - taking part in illegal or inappropriate behaviour
 - divulging classified, sensitive or confidential information
 - breaching the terms of your employment.
- 4.2 All social media messages must also abide by data protection laws and protect patient confidentiality and information assets of all kinds.
- 4.3 Postings online are subject to the same laws of copyright and defamation as written or verbal communications, whether they are made in a personal or professional capacity.
- 4.4 You should not share anything on social media that you would not share on any other public channel or would not wish others to receive. Be aware of your personal responsibility for the words you post and also for the comments of others you allow on your blog, webpage or social media account. Once something is put on a social networking site, even if you delete it, there may be a record of it kept indefinitely.

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- 4.5 Remember, your online conduct is subject to the same disciplinary standards as your offline conduct. Staff found to be posting inappropriate or derogatory content online relating to the Trust, members of staff, patients or relatives, may be subject to formal disciplinary action in accordance with the Trust's Disciplinary Policy and Procedure. Please refer to this policy for further guidance. This includes all forms of online publishing and discussion, including blogs, file-sharing, user-generated video and audio, virtual worlds, social networks and other group messaging applications, regardless of whether the profile notes that the account is personal only.
- 4.6 Do not post materials that could be considered discriminatory e.g. re gender, marriage or civil partnership, gender reassignment, pregnancy and maternity leave, sexual orientation, disability, race, colour, ethnic background, nationality, religion or belief and age.
- 4.7 Staff must refrain from identifying patients or visitors by name and remember that describing a set of circumstances may make someone identifiable even if their name is not published. This can cause distress and concern for patients and relatives and may bring the Trust into disrepute.
- 4.8 You should not discuss work-related matters regarding individual patients, visitors or incidents, nor post photographs relating to these on your personal accounts, unless it is as part of an approved closed or secret Facebook group which has been set up specifically for work purposes. Please see section 7.6 for further details on applying for approval to set up a page/group.
- 4.9 Please treat colleagues with dignity and respect by not posting anything about them which would not be welcome or deemed appropriate, or posting photographs of them on social media without their permission. Please remove any information about or images of a colleague if that colleague asks you to do so. Failure to comply may be considered as bullying or harassment and managed under the Trust Dignity and Respect at Work Policy.
- 4.10 You should not use personal social media accounts to communicate with other members of staff about sensitive work related matters, unless it is via an approved closed or secret Facebook group set up specifically for work purposes. Please see section 7.6 for further details on applying for approval to set up a page/group.
- 4.11 You should not use personal social media accounts to communicate with patients (except where the patient is an existing friend or relative) or accept friend requests from them. Any communication with patients via social media must only be through a separate 'professional' account set up specifically for a Facebook group which has been approved by the Communications Department.

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- 4.12 If a patient contacts you about their care or other professional matters through your personal profile, you should politely explain that you cannot mix social and professional relationships. Do not engage in any conversations about their care and ask them to contact the PALS Team to discuss any concerns they may have.
- 4.13 Guidance on use of social media can be found from many sources including the [NMC](#), [GMC](#) and [HCPC](#).

5. Personal use of social media and online safety

- 5.1 Individuals should take measures to protect themselves by ensuring their privacy settings are set appropriately. Information posted on social networks may result in risks to personal safety so think carefully about what you want to share in both personal and official use of social media. On personal social networks - even closed groups - you should be aware that posts can still be shared outside your network.
- 5.2 Protect yourself on social media and never state your address, telephone number or date of birth. Do not reply to messages or accept friend requests from people you don't know.
- 5.3 When registering with a website, understand what you are signing up to by reading the terms and conditions carefully and importantly determine what security, confidentiality and liability claims, undertakings and exclusions exist.

6. Use of social media by individual staff at work

- 6.1 There is only limited access to social media from Trust devices due to the lack of bandwidth, however the staff intranet displays the Trust's Twitter feed.
- 6.2 LinkedIn is a professional network and is accessible from Trust devices however if accessed during work time it must only be used in a professional context for work purposes.
- 6.3 The Trust recognises that it is sometimes necessary for staff to view materials on YouTube e.g. training videos, and staff may access YouTube at work when necessary for a limited amount of time, strictly for work purposes.
- 6.4 Social media must not be used for whistleblowing or raising a work related concern. This should be done through an appropriate channel. Please refer to the Raising Concerns policy for further guidance.

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- 6.5 Staff are encouraged to use social media for listening, following discussions, keeping track of news and building networks as part of their day to day work. It is recognised that staff may use their own home or Trust mobile devices to access social media, however use for non-business related reasons should be limited to breaks or for urgent messages whilst at work.

7. Use of social media by staff on behalf of their service

- 7.1 Using social networking sites to communicate with stakeholders in a professional capacity can be an appropriate way of providing information and engaging in conversations.
- 7.2 Services wishing to communicate messages via Twitter should contact the Communications Department who will assist by tweeting and retweeting content on behalf of the service.
- 7.3 Services may be given permission to create their own Facebook page or group (e.g. Diabetic Eye and Foot Screening Facebook Group) provided that they can demonstrate that the corporate account is not appropriate and that they adhere to Trust guidance around the use of this account.
- 7.4 The use of photographs on websites and social media requires permission from the subject photographed or their parent/legal guardian. Consent forms are signed and kept on file for all photographs taken by Medical Illustration.
- 7.5 The service must ensure that they have the capacity to properly manage the page/group to a professional standard. It should be moderated Monday to Friday 9a.m. - 5p.m. and comments and messages replied to in an appropriate and timely manner.
- 7.6 Individuals and services wishing to set up departmental social media accounts, pages or groups which represent the Trust should seek advice from the Communications Department. The application form for setting up an account which can be found in Appendix D must be completed and sent to the Communications Department who will review the proposal. Creation of the page/group/account will either be approved or discussed further with the service if further detail is required or if other methods of communication are thought to be more appropriate. The Communications Department will join/follow the group/page as an inactive member purely for monitoring purposes.
- 7.7 Failure to follow these rules and inappropriate use of official social media accounts may be considered as potential misconduct and managed under the Disciplinary Policy and Procedure.

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8. Use of internet and social media by non-Trust personnel

- 8.1 Only people with a Trust network account may use Trust devices to access the web and social media or indeed for any reason whatsoever. Staff must never give another person – including volunteers and subcontractors - access via their own Trust account or allow them to view confidential information on shared Trust devices.
- 8.2 The Trust will not permit non-Trust personnel to take photographs or post comments on social media of patients, visitors or staff members on Trust premises unless informed consent has been given and is appropriate. Examples of where this may be appropriate with consent include photos taken by family members with a new baby.
- 8.3 Staff should challenge anyone who appears to be using a mobile device inappropriately to take photos or comment on social media about other patients, visitors or staff. This is important in the maintenance of privacy, dignity and confidentiality. It is particularly important in the case of children or vulnerable adults.
- 8.4 Inappropriate use of social media which cannot be addressed by staff and management in the department should be reported to the Communications Department who will investigate any content which has been posted and if necessary, report the content to the social media platform administrators.
- 8.5 Freedom of speech entitles members of the public to post their opinions online and it will not always be possible to get posts removed. If online posts: are an invasion of privacy, and/or do not have the consent of people featured in photos/videos; make false allegations; or could be seen as a criminal offence e.g. hate crime or harassment, then it is possible to get posts taken offline. Freedom of speech and entitlements to privacy can however be overruled if it is deemed that it is in the public interest for that information to be made available.
- 8.6 Staff should challenge anyone who appears to be sharing inappropriate sites – for instance pornography -- with others. If this is with children or vulnerable adults it could be a safeguarding issue and must be reported as such, even if the person sharing the material is a guardian, carer or parent. Similarly staff should challenge anyone who attempts to make inappropriate arrangements to contact a child or vulnerable adult via social media.
- 8.7 It is recognised that it will be difficult to manage these aspects of the social media policy. The organisation will help by:
- producing advisory posters for wards and departments
 - including information in the inpatient bedside booklets
 - including information in the relevant patient sections of the Trust website.

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9. Responsibilities

- 9.1 The organisation will take all reasonable steps to ensure that users of the internet service and social media websites are aware of policies, protocols, procedures and legal obligations relating to the use of the internet. Advice is available from the Communications Department if staff have any queries on this policy. Please see also the Email and Internet Usage Policy.
- 9.2 The Head of Communications will be responsible for corporate social media accounts and for approving applications for team or service social media accounts. Communications will also monitor corporate social media activity, and comments about the Trust.
- 9.3 The Chief Informatics Officer will be responsible for technical aspects of social media.
- 9.4 Account Editors must abide by the Social Media Policy and sign the declaration on the application form (see appendices). They will be responsible for ensuring their accounts are regularly and frequently updated and that the account adheres to this policy. They must remove offensive or inappropriate material and, if posted by a staff member they must also report it to that person's manager. They must consider measures to ensure confidentiality and safety of patients / service users is not breached, particularly if children or vulnerable adults are involved.
- 9.5 Once aware, line managers should seek advice from HR and take appropriate action in line with the Trust's Disciplinary Policy and Procedure if a member of staff posts offensive or inappropriate material on a social media website. The same rules apply to closed groups on social media sites and group messaging applications.
- 9.6 All staff must follow the guidance in this policy and have an understanding of the risks associated with the use of social media.

10. Monitoring

- 10.1 Bolton NHS Foundation Trust will maintain appropriate monitoring arrangements in relation to internet and social media related usage from the equipment and services it provides, and will also monitor the social media sites and accounts which it gives staff permission to set up in connection with Trust business or services.
- 10.2 The Trust will typically investigate inappropriate activity under the following circumstances:

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- a report by a member of staff to their line manager raising concern about the content of social media pages and accounts
- a concern raised by a line manager about inappropriate personal use of social media by a member of staff
- routine monitoring by the IT Department identifies potential inappropriate use from Trust equipment
- routine monitoring by the Communications Department of accounts and information posted.

10.3 Please note that this list is not exhaustive and any inappropriate activity may be subject to formal disciplinary action in accordance with the Trust's Disciplinary Policy and Procedure.

10.4 The number and type of social media accounts established under this policy will be reviewed every twelve months, along with the usage of each account and whether there is a continued requirement for it within the service.

11. References

Disciplinary Policy and Procedure

Diversity and Inclusion Strategy

Information Security Policy

Internet and Email Usage Policy

Mobile Communications Policy

Raising Concerns Policy

Safeguarding Policy

BMA

www.bma.org.uk/ethics

General Medical Council

www.gmc-uk.org/guidance

NHS England - Social Media and Attributed Digital Content Policy

<https://www.england.nhs.uk/wp-content/uploads/2016/04/sm-policy.pdf>

Nursing and Midwifery Council

<https://www.nmc.org.uk/standards/guidance/social-media-guidance/>

Rethink Mental Illness

<https://www.rethink.org/services-groups/support-groups/facebook-for-groups>

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Appendix A

Guidance for staff setting up and managing Facebook pages/ groups

Staff may wish to set up a Facebook page or group for their service either for use with colleagues, patients or members of the general public. Groups and pages make it easy to share information about events, link to useful online content and interact with other users.

Any member of staff can apply to the Communications Department to set up a Facebook page or group providing that:

- they can illustrate that the corporate social media accounts are not appropriate for communicating their messages
- the account will be well moderated
- guidance in this policy is adhered to.

What support is available?

The Communications Department will be able to support you in thinking through how you want to run your Facebook page or group and offer advice on moderating comments and content. However they can't offer technical support if you have a problem with your computer. If you aren't sure how to use Facebook you can find full instructions at www.facebook.com/help/.

Ground Rules

For a Facebook group, it is important to develop some ground rules so that moderators and group members have something to refer to once the group is up and running. These should be visible on the group page as a pinned post.

You may wish to discuss the ground rules with your colleagues and potential members of the group (if it is a group for patients) to make sure they are appropriate.

Some suggested ground rules are:

- Be supportive towards each other and share information to help the group thrive.
- Treat everybody with respect, regardless of differences in culture, ability, race, gender, age, sexual orientation or social class.
- Please respect the privacy and confidentiality of others by not sharing their information.
- Please be polite and respect the rights and opinions of others in the group. Please avoid coarse, rough, rude or derogatory language.

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- No selling or promoting business, or fundraising for organisations other than the Trust.
- Make sure you have the permission of people featured in any photographs or videos you upload.
- Group members must not bring the Trust into disrepute.
- Any post may be removed by the moderator if it offends or is inappropriate.

You and your moderators may decide to add others.

Privacy

All user accounts on Facebook have privacy settings and individual users are responsible for ensuring that they protect their personal information. You should regularly review your privacy settings to check what information other users can see about you and to keep your account secure.

There are several ways to protect people’s privacy online. It is important to discuss your Facebook group with your potential group members, and to listen to any concerns about privacy. Before encouraging them to join your Facebook group, you may wish to provide them with the information provided in Appendix B.

Facebook offers three levels of privacy for groups: public, closed, and secret. The table in Appendix C shows the differences between the settings.

When thinking about which privacy setting is right for your group, consider who your group is for, whether members will want other people to see that they are in the group, view posts and see stories about the group.

If you want to use your Facebook group to attract new members, you should have a closed or public group.

Confidentiality

To help people feel confident in joining the group, it is important to have a very clear confidentiality policy as part of your ground rules, written in language that is easy to understand. This should also be included in your pinned post. Please see examples below:

For a secret group:

“This group is secret. This means that only people who are invited to join the group can see who is a member or what people post. Everything you share with the group is confidential. Members must respect each other’s confidentiality at all times, both on and offline. The only exception to this is a post which suggests someone may need urgent help or is at risk of harm. These posts should be flagged to the moderator, who may need to contact a relevant professional. If you are using a

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shared computer, please remember to log off Facebook, to protect the privacy of other members of the group.”

For a closed group:

“This group is closed. This means that people who look at the group page can see who is a member, but only members can see what is posted. Everything you share with the group is confidential. Members must respect each other’s confidentiality at all times, both on and offline. The only exception to this is a post which suggests someone may need urgent help or is at risk of harm. These posts should be flagged to the moderator, who may need to contact a relevant professional. If you are using a shared computer, please remember to log off Facebook, to protect the privacy of other members of the group.”

For a public group:

“This is a public group. This means that anyone who is looking at the group page can see who is a member and what is posted. We request that everyone who looks at the group page respect confidentiality at all times, both on and offline. However please bear in mind that this is a public space. Posts which suggest that someone is in need of urgent help or is at risk of harm should be flagged to the moderator, who may need to contact a relevant professional. If you are using a shared computer, please remember to log off Facebook, to protect the privacy of other members of the group.”

What should I post?

Have a good overview of the page/group and its purpose and a suitable profile photo.

For a Facebook group you should have a pinned post as an overview. A good example of a pinned post would include:

- Short description of the group
- Names of the group moderators and key contact details
- Ground rules for the group
- Privacy and confidentiality statement

Post content regularly to keep your followers/members engaged and tailor the length and types of updates to the audience needs and expectations. You can use an informal tone on social media so be conversational to encourage more interaction.

On pages and groups you should share relevant information which may be of interest to page followers/group members but ensure any third party content is reliable and appropriate.

On a Facebook group you may wish to start discussions by asking open questions that are relevant to the whole group. You can also use it as a way to make plans and organise events, or if applicable, think about potential speakers you might like to come to a group meeting.

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What not to post...

Be cautious about promoting other Facebook groups as you cannot ensure that their content is accurate, safe and supportive.

Do not post anything which may cause offence or which could be misinterpreted.

Do not post anything that breaches copyright or could be construed as advertising or promoting a commercial company.

Remember that once something is posted it is very difficult to remove.

Moderating

When someone posts on your page or in your group you will receive a notification. Generally your role will be 'liking' people's posts, or commenting on them. Something as simple as thanking someone for sharing their experience can be really supportive and encourage them to post again.

There may be occasions when someone posts something inappropriate which needs to be removed. As a group administrator you can remove posts and hide comments.

In extreme cases you may need to report content to the Communications Department, Facebook or block or remove someone from the group if they consistently go against the ground rules. Before such action is taken, you should try and discuss the issue with the individual in a private message.

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Appendix B

Guidance for patients joining Facebook groups

Facebook is a social networking site which allows individuals and interest groups to connect online. People who have been invited to (and have joined) a Facebook group can post comments, share articles and pictures and recommend other websites to others in the group.

Do I need to be signed up to Facebook to take part in the group?

Yes. If you don't already have a Facebook account, you'll need to create one so that you can join the group. Setting up a Facebook account is fairly simple and just needs a few personal details such as your name and email address. You can then add as much or as little information to your profile as you wish.

What if I don't want some people finding me or contacting me on Facebook?

You are in control of who you connect with on Facebook. People do use it to search for friends and contacts who they might want to stay in touch with, but they have to make a request (and you have to agree) before they can see your full profile and connect with you. If you don't want someone to connect with you, you can simply decline a 'friend request', and the other person will not know you have actually declined it.

Do I have to use my real name?

Although Facebook encourages people to use their real names, you might want to use a pseudonym instead. If this is the case then you should use something that sounds like a 'real' name (e.g. Peter Smith) rather than an obviously made-up one (e.g. Fairydust87). Facebook will delete profiles that it feels are fake. You may wish to use your middle name for example instead of your first name.

Can others see I have joined the Facebook group?

This depends on the status of the group and whether it is open, closed or secret.

Ground Rules

There will be some ground rules for the group and as a member you will be expected to:

- Be supportive towards each other and share information to help the group thrive.
- Treat everybody with respect, regardless of differences in culture, ability, race, gender, age, sexual orientation or social class.
- Please respect the privacy and confidentiality of others by not sharing their information.
- Please be polite and respect the rights and opinions of others in the group. Please avoid coarse, rough, rude or derogatory language.

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- No selling or promoting business, or fundraising for organisations other than the Trust
- Make sure you have the permission of people featured in any photographs and videos you upload
- Group members must not bring the Trust into disrepute
- Any post may be removed by the moderator if it offends or is inappropriate

It may be helpful to double check what you have written before you press post to ensure your message comes across in the way it was intended. Sometimes electronic messages can be perceived as harsher than intended because there are no visual clues such as facial expression or body language. You may wish to use emoticons such as a smiley face to portray emotions and help convey how you feel. Avoid sarcasm as people who don't know you may misinterpret its meaning.

If you disagree with what someone has said, please bear this in mind as you express that disagreement. If you are offended by comments, please don't post angry retorts.

What if someone posts a message that goes against the ethos of our group?

The Facebook group is moderated by members of staff who will monitor the content and ensure that there is nothing inappropriate being posted. If you are concerned about anything posted within the group or feel offended, please contact the group moderator by sending them a private message or alternatively, you can report it to the moderator by using the 'Report' button next to the post in question.

The moderator will edit or delete the post as necessary. Remember, you might not always agree with someone's point of view expressed in a post, but that doesn't mean it should be reported – it would need to break the rules of the group (i.e. be offensive) in order for the moderator to remove it.

If you have any concerns about content or the way the group is working or being managed then you can email the Communications Department at communications@boltonft.nhs.uk

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Appendix C

Facebook Group Privacy Settings

	Public	Closed	Secret
Who can join?	Anyone can join or be added or invited by a member	Anyone can ask to join or be added or invited by a member	Anyone, but they have to be added or invited by a member
Who can see the group's name?	Anyone	Anyone	Current and former members
Who can see who's in the group?	Anyone	Anyone	Only current members
Who can see the group description?	Anyone	Anyone	Current and former members
Who can see what members post in the group?	Anyone	Only current members	Only current members
Who can find the group in search?	Anyone	Anyone	Current and former members
Who can see stories about the group on Facebook (like in News Feed and search)?	Anyone	Only current members	Only current members

Appendix D

Application Form for a Facebook Page or Group

Please complete this form if you wish to apply for permission to set up a Facebook page or group and send it to: Communications Department, 1st Floor C-D Block, RBH.

Main contact name:

Job title:

E-mail address:.....

Telephone number:

Name of required Facebook page/group:

Type of account to be set up:

Facebook page

Facebook group: Public Closed Secret

Has the division/department agreed to this application? Yes No

Department/service/campaign that the account will be used for:

.....
.....

What is the purpose of the account?.....

.....
.....

Who is your primary audience:

Why is it not appropriate to use the Trust's corporate account?

.....
.....
.....

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How long is the account intended to be used for?

Long-term 0-3 months 3-6 months Other (please state)

What other methods of communication do you use/intend to use?

.....
.....
.....

Page/Group Moderators

Lead moderator name:

Lead moderator job title:

Lead moderator contact no.:

Second moderator name:

Second moderator job title:

Second moderator contact no.:

Do the account editors know the procedure for reporting the misuse of social media if it is by a member of staff? Yes No

Declaration

I acknowledge that I have read and understand the terms and conditions applicable to the use of social media accounts and agree to abide by the guidelines set out by the Social Media Policy.

Signed: Date:

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Please respect the privacy and dignity of others and do not film, take photographs of, or make comments about patients, visitors or staff on social media without consent.



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Appendix F

Equality Impact Assessment Tool

To be completed and attached to any procedural document when submitted to the appropriate committee for consideration and approval.

		Yes/No	Comments
1.	Does the document/guidance affect one group less or more favourably than another on the basis of:		
	• Race	No	
	• Ethnic origins (including gypsies and travellers)	No	
	• Nationality	No	
	• Gender (including gender reassignment)	No	
	• Culture	No	
	• Religion or belief	No	
	• Sexual orientation	No	
	• Age	No	
	• Disability - learning disabilities, physical disability, sensory impairment and mental health problems	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are there any valid exceptions, legal and/or justifiable?	No	
4.	Is the impact of the document/guidance likely to be negative?	No	
5.	If so, can the impact be avoided?	No	
6.	What alternative is there to achieving the document/guidance without the impact?	No	
7.	Can we reduce the impact by taking different action?	No	

If you have identified a potential discriminatory impact of this procedural document, please refer it to your divisional E and D lead together with any suggestions as to the action required to avoid/reduce this impact.

For advice in respect of answering the above questions, please contact the Equality and Diversity Lead.

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