

Social Media Policy

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CONSULTATION SCHEDULE		
Name and Title of Individual	Groups consulted	Date Consulted
Director of Corporate Governance	Internal	16/8/24
Head of Communications and Engagement	Internal	3/9/24
Staff Engagement Group	Internal	19/9/24
Head of OD, People and Inclusion	Internal	16/12/24

IMPACT ASSESSMENTS		
	Date Completed	Comments
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VERSION CONTROL				
Version	Job Title of Policy Author/Lead	Ratification Date	Ratification Body	Summary of Amendments

Document Status: *This is a controlled document. Whilst this document may be printed, the electronic version posted on the intranet is the controlled copy. Any printed copies of this document are not controlled. As a controlled document, this document should not be saved onto local or network drives but should always be accessed from the intranet.*

1.0 Introduction

Staffordshire and Stoke-on-Trent Integrated Care Board (ICB) uses social and digital media to provide information and as a way of encouraging open, honest and transparent engagement with stakeholders. We believe that effective use of social media will enhance our brand and reputation, providing essential channels for effective communication.

Our employees are our best ambassadors. Many already use social media, both in a personal and professional capacity. The use of social media is an important channel for professional communication, learning and gaining a work profile. We understand the value that this can bring to individuals and to the organisation.

This policy outlines the ICB's stance on what is acceptable use of social and digital media, including social media/networking and the external use of other online tools.

These guidelines cover the use of social media in a personal, or professional capacity, by clinical and non-clinical employees or those that work with /alongside the ICB, including Board members and GPs, hereafter referred to as staff.

This policy applies to the Staffordshire and Stoke-on-Trent Integrated Care Board. Where the term Staff is used this includes Non-executive Directors, Clinicians and contractors working on behalf of the ICB.

2.0 Purpose of the Policy

The purpose of this policy is to:

- protect the reputation of the organisation
- protect employees' interests
- provide guidance for the appropriate use of social and digital media which will enhance the ICB's activities and contribute to the professional development of individual employees.

3.0 Scope

The Communications and Engagement Team has authority to speak on behalf of the ICB and is responsible for managing the ICB's official sites.

This policy applies across all social media platforms, including but not limited to:

- Twitter
- Facebook
- Instagram
- YouTube
- LinkedIn
- Flickr
- Pinterest
- Tumblr
- TikTok
- Smart phone applications e.g. Snapchat, WhatsApp, Social Media Usage

The ICB/ICS currently have social media accounts for X, LinkedIn, Facebook and Instagram with 'StaffsStoke ICS or ICB' as the name, as well as YouTube accounts called 'Staffordshire and Stoke-on-Trent ICB' and ICS.

Our social media handles are:

- X - @StaffsStokeICB @StaffsStokeICS
- Facebook - StaffsStokeICB and StaffsStokeICS
- LinkedIn – staffsstokeics

Our corporate accounts:

- support our corporate objectives.
- promote good news stories about the ICB, ICS and wider partners.
- announce new service developments and examples of innovation and good practice.
- support local, regional and national NHS or government communication and behavioural change campaigns.
- promote key messages about our services.
- give information about changes to services.
- are checked throughout the day between 9am and 5pm. Comments and queries received outside of working hours are responded to the next working day. Comments requiring input from another department are passed onto the right person to provide an answer directly to the enquirer.

4.0 Definitions

- **Algorithm:** In social media terminology, people often use 'algorithm' as a shorthand for 'feed algorithm', which is the set of rules a social media platform uses to automatically decide which posts come first in your feed. For example, if TikTok decides that it wants to prioritize posts with lots of comments, it adjusts the rules of its feed algorithm to push those posts up.
- **Analytics:** Analytics is the process of following metrics on your social media performance and using that data to improve your strategy. For instance, watching your engagement rate over time to see if your posts are becoming more or less compelling to your followers is one way of using social analytics.
- **Audience:** Your social media audience is the group of people you're able to reach with your content. This includes all your followers, plus anyone who sees or interacts with your posts in their feed. Growing your social media audience is one of the best ways to spread brand awareness.
- **Bio:** Your social media bio is a short description in your profile that tells people who you are. It's also a great place to share links to your website or other accounts. On Facebook, Instagram, and Twitter, it's simply called a bio, while on LinkedIn it's called a summary.
- **Crisis management:** Social media crisis management is how you handle events or interactions that could potentially damage your company's reputation. Inappropriate posts by someone at your company or a social media boycott against your brand may qualify as a social media crisis, while a couple of angry comments from customers would not. Crisis management requires social media managers to respond quickly and follow a plan to de-escalate the problem at hand.

- **Direct message (DM):** A direct message on social media is a private message sent directly to a user's inbox. DMs exist in contrast to public forms of interaction on social media, like commenting on an image or posting on a user's timeline.
- **Engagement rate:** Engagement rate is a social media metric that tells you how much a post is motivating people to interact with it. It's defined as (number of people who engaged with your post / number of people who saw your post) x 100%. Typically, a higher engagement rate means your post was more compelling (or at least more likely to provoke a response). Engagement rate is difficult to compare across social networks, as what counts as an "engagement" and what counts as "seeing your post" is different on each network. "Seeing your post" could refer to reach or impressions, while "engagements" may include likes, comments, shares, reactions, and more.
- **Feed:** A feed on social media is a generic term for the stream of content you see from other users. On most social networks, the feed functions as a homepage and is the most common way to see people's posts and engage with them.
- **Follower:** A follower is a user on social media who has selected to see your posts in their feed. Both personal and business accounts can have followers. Your number of followers, or follower count, is a key metric for seeing how your audience on social media is growing or shrinking over time.
- **Hashtag:** A hashtag (#) is a way of connecting your posts on social media to other posts on the same subject or trending topic. By searching for a specific hashtag, users can find all public posts that have it. For example, users seeking content about the World Cup might look for posts with #WorldCup or #FIFA. Social media marketers often follow the popularity of hashtags over time to see what's trending on social media.
- **Header image:** Your header image, or cover photo, is the visual you place at the top of your social media profile. Often in landscape format, header images are much larger than your profile picture and can be used to introduce you or your brand to your profile visitors. They can complement your profile picture, show off your personality, or promote your products or events.
- **Impressions:** Impressions are a social media metric that measures how many times your post has been shown in users' feeds. Unlike with reach, you may count multiple impressions for a single user if they have looked at your post more than once. Each social network counts impressions differently.
- **Platform:** The term social media platform is often used to mean the same thing as "social media network" or "social media channel." However, a social media platform is technically the software behind a social network, including its API, backend, and markup language.
- **Reach:** Reach is a social media metric that tells you how many people have seen your post. It differs from impressions in that even if a user sees your post multiple times, they still only count as one person reached. Reach is an important metric for understanding how large the audience for your content is and measuring your progress toward spreading brand awareness.
- **Social listening:** Social listening is how social media managers track conversations around key topics, terms, brands, and more, often with a specialized software tool. Social listening software gathers mentions, comments, hashtags, and relevant posts from across social media networks to provide insights on what users are talking about and how. Brands often use these insights to tap into key trends and see what people are saying about them and their competitors.

- **Social media monitoring:** Social media monitoring is often confused with social listening, but there are some important differences between the two. Social listening involves actively setting up projects to seek out conversations on specific topics and gathering data on them. Social media monitoring, on the other hand, is the more passive technique of keeping an eye on your mentions and following what your audience is saying.
- **Social media:** Social media is a collective term for websites and applications that focus on communication, community-based input, interaction, content-sharing and collaboration. People use social media to stay in touch and interact with friends, family and various communities.
- **Social media channels and platforms:** This includes but is not limited to: Facebook, X (formally known as Twitter), Instagram, LinkedIn, TikTok, Snapchat and YouTube.
- **Social media accounts:** Named profiles on a social media platform representing a person or organisation and enabling them to participate in information/opinion sharing and conversation.

5.0 Roles and Responsibilities

- This policy should be followed by all staff, including any interns, apprentices and volunteers, as well as interim and agency staff.
- It covers normal working hours, but also extends to personal time when any public reference to the ICB/ICS is made.
- The ICB encourages staff to make reasonable and appropriate use of social media as part of their work. Staff/departments wanting to post news items on existing social media accounts should contact the Communications and Engagement Team who will support you.

5.1 All ICB Employees and Board Members

- All Integrated Care Board members and staff have a duty to ensure they familiarise themselves with and adhere to the guidelines set out in this policy.
- Employees should not communicate on behalf of the ICB unless this is an accepted normal part of their job, or unless this has been agreed with their manager or the ICB's Communications and Engagement Team. Staff wanting to post news items on existing social media accounts or have suggestions about content related to a team or project, should contact the Communications and Engagement Team.
- If comments or queries are posted outside of working hours on any of our corporate social media accounts, represent a risk to patient safety, or a serious risk to the ICB or ICS' reputation, they should be flagged to the duty communications manager on call, who will respond as appropriate.
- No social media sites, pages or content relating to the ICB should be set up by employees without prior approval. Employees wanting to set up a work-related presence on Twitter, Facebook, or any other social networking site, should discuss their proposal with the Communications and Engagement Team in the first instance.
- Opportunities occasionally arise for employees to blog, in an official capacity, on alternative platforms or websites. To ensure that they are appropriate, and provide benefit to the organisation, these opportunities should be discussed, and agreed, with the Communications and Engagement Team.

- Staff choosing to use social media must be aware that their activity can be traced back to them. The conversations that you take part in and the things that you share about yourself can be enough to identify that you work for the ICB, even if you don't say that in your profile.
- Individuals should take responsibility for protecting their own security online, including but not limited to restricting access to their accounts, blocking unwanted followers and reporting hacked accounts to the platform provider.
- We encourage staff who want to have a presence on social media channels which in some way connects them to our organisation - for example, referring to the ICB or ICS in their profile, interacting with or commenting on ICB and ICS content in a way which indicates they are a member of staff, etc - to do so in a way that upholds our values and maintains or amplifies the work we do to deliver our corporate objectives. This means that social media activity should at the very least not undermine our work to promote positive and supportive health messaging, showcasing best practice, innovations and achievements.
- Comments and content posted by staff on social media channels express the views of the people submitting them. Unless comments are posted by an authorised user of the ICB and ICS' corporate social media accounts, by an approved departmental account, or are retweeted/reposted by the official accounts, these comments don't reflect the view of the ICB or ICS.
- If you publish content to any site/platform outside of the ICB that could be perceived to have a connection to the work you do or subjects associated with Staffordshire and Stoke-on-Trent ICB, you must display a disclaimer such as this: "My postings on this site reflect my personal views and don't necessarily represent the positions, strategies or opinions of Staffordshire and Stoke-on-Trent ICB."
- If you're approached online by a patient or relative, be clear that social media is not the right way to discuss care or raise concerns and direct them to contact the ICB appropriately. If you are unsure, you should seek advice from your line manager or the ICBs Communication and Engagement Team.
- When using social media, or while online in any capacity, you must not:
 - Reveal confidential information about our residents, patients, staff or the business activities of the ICB or ICS – this includes photographing residents, patients or colleagues without their consent.
 - Comment on anything related to legal matters or complaints. If you're not sure if something's about a legal issue, do not comment at all. This applies to statements coming from our corporate accounts, and to comments on our corporate channel posts. The Communications and Engagement Team will handle public comments in line with agreed ICB processes.
 - Respond on behalf of the ICB to content published by third parties by adding comments. If appropriate, the Communications and Engagement Team will respond to any questions, complaints, media requests and personal issues raised in posts by acknowledging the message and seeking to form a response with the appropriate team. Employees who read something online that they consider to be factually incorrect, inaccurate or otherwise needing an official response from the ICB, should refer the matter to the Communications and Engagement Team.
 - Engage in any activities which might bring the ICB and ICS into disrepute.

- Use the internet in any way to attack or abuse colleagues, patients or visitors to our sites.
 - Post defamatory, derogatory or offensive comments about colleagues, patients, visitors, your work or the ICB and the ICS.
 - Post defamatory, derogatory, discriminatory or offensive comments that could be perceived as bullying or harassment - please read the ICB Dignity at Work policy.
 - Express grievances about your job, your colleagues or the ICB – instead follow the appropriate policy or procedure including the Grievance policy, Dignity at Work policy or the Freedom to Speak up Policy. All these policies are available on the staff intranet.
 - Respond to requests for interview or opinion by journalists or members of the press – instead follow the guidance set out in the Media policy and direct them to contact the Communications and Engagement Team.
- All social media activity by any member of staff must adhere to the ICB policies on confidentiality and information governance, internet usage, and declarations of interests, gifts, sponsorship and hospitality. Staff are individually responsible for content they post or publish online and should use discretion and common sense in all social media activity.
 - This includes any individually identifiable information about residents, patients or people, including those featured in the background of photos/video footage or other content. Any activity by staff which brings the ICB into disrepute - including posting, re-posting, commenting on or otherwise endorsing inappropriate content - could result in the ICB's disciplinary procedures being invoked.
 - Staff should remember that they are ultimately responsible for what they publish online and that there can be consequences if policies are broken. If you are considering publishing something that makes you even slightly uncomfortable, review the policy above and ask yourself why that is. If you're in doubt or in need of further guidance, please contact the ICB's Communications and Engagement Team to discuss. Non-compliance with the policies associated with this guidance may lead to formal action. Employees should always ensure that they are clear about the use of social media and seek further advice as necessary. The ICB reserves the right to take formal action (if after investigation) it is found that the ICBs social media Policy has not been followed by employees.
 - Employees should take precautions when using social media. It is important therefore to check the privacy settings on your accounts are adequate. You should carefully consider who you allow to join your network and disclose personal information to. Adjusting your privacy settings on a social networking site will restrict who can access your profile and will therefore prevent strangers finding out personal information about you.
 - We reserve the right not to respond to comments based on the nature and content of the message and encourage staff to adopt this approach if someone negatively comments on their posts. If the comments include profanity, spam, random attacks that don't make sense, aggression, cultural slurs, racial bias, harassment, threats, etc. you have the right, and should exercise the right, to delete anything. In these cases, consider banning and/or blocking the person from posting again. They might still be able to see their comments and friends of theirs may see them as well, but new people to the page will not be able to see the comments. You also have the option to report them.
 - People who continually post content of the above nature can be referred to as 'trolls. They revel in being able to get you "riled up" and the only cure to stop them from commenting is to ignore them altogether, and/or report and block them.

5.1.1 Accessibility

- Social media is generally thought of as a preferred medium for younger people. However, this differs widely by platform and older generations are also increasingly online and active users. The engagement with age groups is therefore dependent on the platform used.
- People may be excluded from using social media due to digital exclusion, literacy, or language difficulties. For a small minority of people in our communities, their religion may exclude them from accessing social media or some aspects of social media due to beliefs about technology or imagery.
- All staff need to make sure posts are equitable and inclusive. This includes video or audio content being accompanied by subtitles or a transcript and ensuring content is sensitive to diverse communities.
- All social media content must use inclusive language, that it is accessible e.g. using additional pronouns, adding subtitles to videos, adding image descriptions to photos on social platforms or using CamelCase in hashtags to ensure that screen readers interpret hashtags correctly.

5.2 Integrated Care Board

The Integrated Care Board is responsible for ensuring that the ICB have systems and processes in place for effective use of social media and handling enquiries and comments received via social media.

5.3. Director of Corporate Governance

- Has overall responsibility for this policy.
- Has responsibility for protecting and promoting the reputation of the ICB and for dealing with media issues arising from social media.

5.4 Communications Manager / Policy Author

The Communications Manager has responsibility for social media policy monitoring, development and implementation and the strategic development of social media tools for corporate use.

5.5 Audit Committee

The Audit Committee is the sponsoring committee for this policy and will seek assurances that the policy is being adhered to.

6.0 Subject Matter of Policy

6.1 Our corporate accounts

The ICB has corporate accounts on Facebook, X (formally known as Twitter), Instagram, LinkedIn, Threads and YouTube.

These accounts are owned and managed solely by the communications and engagement team and monitored Monday to Friday 9am-5pm.

We encourage staff to contact the communications team if they want to share news, events or messages relating to their work on our corporate accounts.

Social media management is undertaken by the digital and communications team through a third-party management dashboard.

6.2 Raising concerns or breeches

- It is the duty of every ICB employee to speak up about genuine concerns in relation to the administration of, and adherence to, the ICB's social media policy. Any concerns should be raised with your line manager or the Freedom to Speak Up Guardians.
- Any contact with the Freedom to Speak Up Guardian, is on a strictly confidential basis.
- This policy aligns with the ICB's [Bullying and Harassment Policy](#) and the [Equality, Diversity and Inclusion Policy](#). The ICB wishes to create a working environment that promotes the right of everyone to be treated with consideration, dignity and respect, including how they are treated and are treated on social media.
- Anyone who wishes to report a suspected or known breach of the policy, who is not an employee or worker of the ICB, should be aware of their own organisation's whistleblowing policy, since most such policies should provide protection against detriment or dismissal.
- All such notifications will be treated with appropriate confidentiality at all times in accordance with the ICB's policies and applicable laws, and the person making such disclosures can expect an appropriate explanation of any decisions taken as a result of any investigation.
- Furthermore, providers, patients and other third parties can make a complaint to NHS Improvement in relation to a commissioner's conduct under the Procurement Patient Choice and Competition Regulations. The regulations are designed as an accessible and effective alternative to challenging decisions in the courts.

6.2.1 Impact of non-compliance

- Failure to comply with the ICB's social media policy, can have serious implications for the ICB and any individuals concerned.

6.2.2 Disciplinary Implications

- The ICB will ensure that individuals who fail to administer or adhere to the ICB's social media policy are subject to investigation and where appropriate, to disciplinary action. This policy aligns with the ICB's [Disciplinary Policy](#).
- This may include:
 - Informal action- such as reprimand or signposting to training and/or guidance.
 - Formal action- such as formal warning, the requirement for additional training, rearrangement of duties, redeployment, demotion or dismissal.
 - Referring incidents to regulators.
 - Contractual action against organisations or staff.

6.2.3 Social media training

- The ICB Communications and Engagement Team will provide training to all employees, Board members and members of ICB committees and sub-committees on the best use of social media. This is to ensure staff and others within the ICB comply with the policy.

6.2.4 Social Media abuse (including trolling, stalking and bullying)

- The ICB will not tolerate the harassment, discrimination, or defamation of staff via social media. It will investigate any allegation of abuse directed at ICB employees via social media platforms.

- This would be defined as, but not limited to, abusive comments posted on social media sites, unauthorised video footage, telephone recordings etc. and applies whether the alleged action took place at work or in users' personal time.

7.0 Safeguarding

As a minimum you should ensure you have completed online safeguarding training and you are aware of your role and responsibilities to safeguarding children, young people and adults as outlined in the Safeguarding Policy.

If you suspect that a child, young person, or adult is subject to social media abuse you should raise it with the relevant Local Authority Safeguarding team:

Children

- Stoke-on-Trent: Children's Advice and Duty Service 01782 235100 (Monday to Friday 8.30am to 6pm). Out of hours duty team: 01782 234234. [Safeguarding Children Partnership | Stoke-on-Trent Safeguarding Children Partnership | Stoke-on-Trent](#)
- Staffordshire: Staffordshire Children's Advice and Support (SCAS) 0300 111 8007 or out of hours 0345 604 2886 [Safeguarding - Staffordshire County Council](#)

Adults

- Stoke-on-Trent: Stoke-on-Trent City Council Contact Centre 0800 561 0015
- Staffordshire: Staffordshire County Council 0345 604 2719 or out of hours 0345 604 2886 www.ssaspb.org.uk

Regarding personal safeguarding, you should report any harassment or abuse you receive online whilst using corporate or personal accounts for ICS/B related business, to the social media team in the first instance (msepartnership.comms@nhs.net). They will advise you what further action should be taken and escalate to the legal, security and HR teams as required. Keep yourself and others safe. Do not place yourself at risk and engage in risk taking behaviour on social media platforms.

7.1 Departmental Accounts

Departments should not set up social media accounts without prior approval from the communications team.

All new requests for departmental social media accounts must come through the corporate communications team to assess the need for the account and establish clear and measurable objectives for success.

In many cases departmental accounts are not appropriate, and better reach and coverage can be gained by channelling content through the ICB corporate accounts, other communications channels, or by setting up an individual professional account.

It is essential that staff members running an approved departmental account have clear objectives and aims to help determine how they will run their account.

Staff wishing to set up a social media account for their department are required to submit an initial request to the communications team inbox (ssotics.comms@staffsstoke.icb.nhs.uk) who will arrange a conversation about the request.

Please note, requests for information made via X/Twitter or other online channels can be considered as freedom of information (FOI) requests where the real name of the requester is discernible. These should be passed to the FOI Team.

7.2 Unauthorised Accounts

If any account is set up without prior approval, the communications team will make contact via messaging or a comment, requesting that the account owner gets in contact so we can provide support and gain the username and password for the account in case of hacking or malicious use. The communications team will then work with the account owner to establish objectives for success.

If the communications team is unable to contact account owners after repeated requests, or if posts originating from an authorised or unauthorised account breach this policy, the account will be reported through the relevant platform's processes for impersonating a verified account or for posting false content, with a view to having the account permanently removed.

8.0 Monitoring

It is the responsibility of all staff to ensure that the social media policy is adhered to and is being embedded within the ICB as appropriate. The Director of Corporate Governance will ultimately be accountable to the Integrated Care Board via the Audit Committee for ensuring that the social media management process delivers as expected and that the process remains robust and operates effectively and reviewed as necessary.

9.0 Review, Ratification and Archiving

The policy will be reviewed every 3 years, or earlier if national policy or guidance, organisational changes are required to be considered. The review will then be subject to review and re-ratification.

The Corporate Governance Team is responsible for ensuring that archive copies of superseded working documents are retained. All policies which have been superseded will be archived.

Please note the authors' responsibilities regarding archiving superseded copies. The author will ensure that a review of the document is carried out in the event of a change in circumstances or immediately prior to the expiry date.

10.0 Dissemination and Publication

Dissemination of the final policy is the responsibility of the author. They must ensure the policy is uploaded on the intranet via the Communications Team. The Communications team is responsible to issue an organisation-wide notification of the existence of the Policy.

Heads of Departments/Managers are responsible for ensuring that all staff (including bank, agency, contracted and volunteers) have access to and are made aware of policies that apply to them.

All staff will be able to access copies of policies via the policy section of the ICB intranet.

11.0 References and Associated Documents

- Government Communication Service (GCS) Digital communication guidance: <https://gcs.civilservice.gov.uk/guidance/digital-communication/>

- Government Communication Service (GCS) Accessible communication: <https://gcs.civilservice.gov.uk/guidance/digital-communication/accessible-communications/>
- Health and Care Professionals Council Social Media Guidance: [Guidance on the use of social media | \(hcpc-uk.org\)](https://www.hcpc-uk.org/guidance-on-the-use-of-social-media)
- NHS England social media and comment moderation policy: [NHS England » Social media and comment moderation policy](#)
 - Standards of Business Conduct Policy
 - Information Governance Policy
 - Disciplinary Policy
 - Safeguarding Policy

12.0 Equality Impact Assessment

- The ICB is committed to ensure that it treats all employees fairly, equitably and reasonably and that it does not discriminate against individuals or groups on the basis of their ethnic origin, physical or mental abilities, gender, age, religious beliefs or sexual orientation.
- The author of this policy has undertaken an Equality Impact Analysis and has concluded there is no impact identified. The analysis is available via the Corporate Governance Team.
- This policy will be monitored for effectiveness by the number of social media concerns that are raised in line with the policy.