

POLICY TITLE:	Use of Social Media by Colleagues
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Author:	People Team
Ratified by:	Andrew Dickson, Group HR Business Partner
Responsible signatory:	Tina Walton, CIO & Transformation Director
Outcome:	This policy: <ul style="list-style-type: none"> ensures there are clear standards and guidance in relation to the use of social media by colleagues
Cross Reference:	HR04.2 Disciplinary Procedure HR04.10 Anti-Bullying and Harassment IT02 IT Security ES13 Health and Safety (Education Settings) OP41 Professional Relationship Boundaries Priory Group Colleague Handbook Priory Group Bank Workers Handbook

EQUALITY AND DIVERSITY STATEMENT

Priory Group is committed to the fair treatment of all in line with the Equality Act 2010. An equality impact assessment has been completed on this policy to ensure that it can be implemented consistently regardless of any protected characteristics and all will be treated with dignity and respect.

In order to ensure that this policy is relevant and up to date, comments and suggestions for additions or amendments are sought from users of this document. To contribute towards the process of review, e-mail RARHelpdesk@priorygroup.com

USE OF SOCIAL MEDIA BY COLLEAGUES

1 INTRODUCTION

- 1.1 Priory Group recognises that the social media sites and applications are an important and integral part of daily life and, if used correctly, can offer valuable business opportunities. However it is also recognises that these sites and applications can pose reputational and/or legal risks to colleagues and/or services users if not used correctly.
- 1.2 This policy therefore aims to guide colleagues to avoid such risks.

2 PURPOSE

- 2.1 The purpose of this policy is to set out to provide support and guidance to colleagues who use social media. These standards apply to all Priory Group colleagues, regardless of their type of employment contract.
- 2.2 The policy should be read in conjunction with the Priory Group Colleague Handbook and IT02 IT Security and procedures particularly those relating to email and internet usage.
- 2.3 This policy is non-contractual and does not form part of a colleague's terms and conditions and accordingly may be amended or departed from at any time and at the discretion of Priory Group.

2 SCOPE

- 2.1 This policy applies to all social media activity whether work related or personal, whether undertaken during working hours or otherwise and whether Priory Group's or a colleague's personal IT equipment is used.

3 WHAT IS SOCIAL MEDIA?

- 3.1 Social media is a type of interactive online media that enables individuals to communicate instantly with each other or to share data in a public forum. This includes email, online social forums, blogs, video and image-sharing websites and similar facilities. This includes, but is not limited to, online social forums such as Twitter, Facebook, LinkedIn and Google+ as well as blogs, wikis and video and image sharing websites such as YouTube, Instagram, Snapchat and Flickr.
- 3.2 Colleagues should be aware that there are many more examples of social media than can be listed here and this is a constantly changing area. Colleagues should follow these guidelines in relation to any social media that they use.

4 EXPECTATIONS

- 4.1 **Use of Social Media at work** – Priory Group will give specific authorisation to a limited number of colleagues to blog/tweet on Priory Group's own Facebook and Twitter accounts. Only colleagues who have been given this specific authorisation can post comments. All other colleagues will not have access to social media websites from the Priory Group's computers or devices at any time.
 - 4.1.1 Priory Group are aware that Personal Communication Devices (PCD) such as smart phones, tablets and laptops enable colleagues to access social media sites or other non-work related sites on personal portable device applications.
 - 4.1.2 Colleagues are able to access PCD's during official rest breaks such as lunchtime but not during working hours unless permission has been specifically granted by the relevant line

manager.

4.2 **Use of Social Media Outside of work** – Priory Group recognises that many colleagues make use of social media in a personal capacity. Colleagues must be aware that when they use social media during non-working hours it is used in an appropriate manner so that there is no reputational or legal risk to themselves, service users or the Company as a whole. The below provides some guidance to colleagues who use social media.

4.3 **Guidelines on the use of social media** – When using social media colleagues are expected to:

- (a) Maintain confidentiality of service users and other colleagues when using social media. Under no circumstances should any service user details or any photographs which may include images of service users be posted via social media
- (b) Avoid any postings or responses on social media which are bullying or harassing in tone towards other colleagues or service users
- (c) Behave professionally, and in a way that is consistent with Priory Group's behaviours and policies, particularly if colleagues can be identified as working for Priory Group via social media
- (d) Be aware that revealing too much personal information through social media puts them at risk of identity fraud, account takeover and their own personal safety
- (e) Set privacy settings on their social media accounts to limit the information which is accessible by the general public
- (f) Assume that everything they post could at some point be made public. Before posting, colleagues should therefore consider whether their comment or posted information is something they would want a colleague, their line manager, a senior manager, service user or client of the Company to read or see
- (g) Report to their Line Manager or Operations Manager any content on a social media site which breaches this policy including content which disparages or reflects poorly on Priory Group
- (h) Remove any posting on a social media site which breaches this policy when required to do so by Priory Group. A failure to comply with this requirement may in itself result in disciplinary action
- (i) Co-operate with any investigation into a breach of this policy by Priory Group
- (j) Raise work related complaints or concerns via the grievance procedure or the whistleblowing policy and not on social networking sites.

4.3.1 Colleagues must ensure they do not:

- (a) Disclose information about service users, colleagues or any other party to whom express and implied obligations of confidentiality are owed
- (b) Post critical, derogatory or offensive comments about Priory Group, work colleagues, service users, business partners, suppliers, competitors or any other business contact
- (c) Make defamatory or disparaging comments about any individual, Priory Group or any other organisation
- (d) Post discriminatory, threatening or intimidating language or comments whether about or directed at a colleague, service user or any other business contact or otherwise
- (e) Take photos or videos on Priory Group premises and then post these via social media without ensuring there is anything in the photo/video that could breach service user confidentiality, the Data Protection Act or that may bring the Company into disrepute
- (f) Post offensive or discriminatory photos, images or links to offensive or discriminatory content
- (g) Engage with any work colleague, colleague or third party seeking to elicit comments or views in relation to concerns about personal grievances or the services provided by Priory Group
- (h) Infringe or misappropriate the intellectual property of Priory Group or of any other organisation or individual
- (i) Breach copyright for example by using someone else's images or written content without permission or failing to give acknowledgement where permission to publish has been given

- (j) Post comments or information about sensitive business-related topics such as Priory Group's performance
- (k) Befriend or link with service users or relatives of service users or business contacts, either through their own solicitation or accepting a request whilst working within the Priory Group and for a period of three years of leaving the Priory Group or after a service user or patient has been discharged from Priory Group Services.

4.4 The above is not an exhaustive list of the different types of inappropriate or unacceptable use, but is a guide only as to what types of activity and communications are to be avoided when communicating through social media sites.

5 CONTRAVENTION OF EXPECTATIONS

5.1 Contravention of the above expectations may be considered:

- (a) A disciplinary offence in line with HR04.2 Disciplinary Procedure
- (b) Bullying and harassment in line with HR04.10 Anti-Bullying and Harassment.

5.2 Such breaches of this policy are taken very seriously by Priory Group and may constitute misconduct or gross misconduct as detailed in the Company's disciplinary policy. Allegations of gross misconduct could lead to the termination of a colleague's contract of employment.

5.3 If further advice on dealing with issues around social media misuse is required, contact the People Team - Employee Relations.

6 MONITORING COLLEAGUES' SOCIAL MEDIA USE

6.1 Priory Group reserves the right to monitor, intercept, review, audit and disclose all colleague activity undertaken using Priory Group's IT resources and communications systems including, but not limited to, social media postings and activities. This monitoring might include, without limitation, intercepting, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing transactions, messages, communications, postings, log-ins, recordings and other uses of the systems as well as keystroke capturing and use of other network monitoring technologies.

6.2 Priory Group may also monitor content on the accessible pages of colleagues' and former colleagues' personal social media accounts to ensure compliance with the terms of this policy and with the terms of a colleague's contract of employment. Such monitoring will be undertaken by a limited number of nominated, senior staff in the IT or legal department.

7 REFERENCES

- 7.1 Data Protection Act 1998
- Human Rights Act 1998
- The Regulation of Investigatory Powers Act 2000
- NMC (2015) Guidance on Using Social Media Responsibly
- BMA (2015) Using Social Media: Practical and ethical guidance for doctors and medical students