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Staff Media and Social Media Policy

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TARGET AUDIENCE (including temporary staff)	
People who need to know this document in detail	Communications team
People who need to have a broad understanding of this document	Executive Team, Executive Directors, QSG members, All Senior Leaders
People who need to know that this document exists	All St Andrew's staff

1. Policy Summary / Statement

The St Andrew's Healthcare Media Policy aims to protect the reputation of the Charity, our employees and the confidentiality of our patients and service users.

- Only nominated spokespeople for the Charity should publicly comment on behalf of St Andrew's Healthcare. This includes commenting on news sites.
- Staff are welcome to share social media content that has been published on St Andrew's official channels, but must ensure their own comments adhere to our Code of Conduct.
- The Communications Team will liaise between stakeholders to issue official statements, comments, interviews and filming opportunities.
- Any media interview should have a member of the Communications Team present unless otherwise agreed.
- Patients and service users who wish to be involved in media opportunities should be supported through the Patient Consent Process.

Open and Honest

Our approach is to be open about all our operations unless sharing certain information could:

- Negatively affect the care of our patients and service users
- Affect the wellbeing or privacy of individuals (including patients, service users and members of staff)
- Give away commercially sensitive information, and put the Charity at a competitive disadvantage.

2. Links to Procedures

Patient Media Consent Guidelines (Appendix A to this Policy)
Information Security Policy
Code of Conduct
Acceptable Use Standard

Policies and Procedures are available via Policy A-Z
[Policies - Policies - A-Z \(sharepoint.com\)](#)

3. Scope

The policy is relevant to all staff. In addition, it is also relevant for patients that are interested in speaking to the media and St Andrew's Healthcare appointed spokespeople.

Social media refers to all public sites where individuals can share thoughts, links, images and videos, including Facebook (including the My St Andrew's page), Instagram, Twitter/X, Loop, YouTube where we have a presence as well as other sites such as SnapChat and TikTok.

This policy is applicable to links, images, videos and all other forms of media content.

4. Background

This policy sets out how St Andrew's Healthcare expects staff and patients to interact with the media, including when posting on social media.

5. Definitions

N/A

6. Key Requirements

6.1. Staff and the media

- Any enquiry from the media should be referred to the Communications Team.
- Only members of Communications, or approved media spokespeople may comment to the media on behalf of the charity.
- In a Crisis Scenario, all communications – both content and timings - must be approved by Gold Command.
- Any interview for publication or broadcast should be attended by a member of the Communications Team unless otherwise agreed.
- **Other members of staff should not speak for the Charity on any occasion** unless specifically requested to do so.
- If contacted by a journalist, staff must decline to comment and direct the journalist to the Communications Team. Staff may also seek guidance from their line manager in this instance.
- The Communications Team will ask for consent from staff members before filming or recording them. If staff are unhappy to be filmed by the media in background shots, they will have an opportunity to make the communications team aware at the start of any event where cameras are present.

6.2. Patients and the media

- Please refer to the Patient Media Consent Guidelines for guidance.
- If a St Andrew's Healthcare patient wishes to take part in a media interview, they will not be unreasonably prevented from doing so. They must have capacity to consent and understand the intended line of questioning and planned use of their comments.
- Their Responsible Clinician should be consulted on whether taking part in the interview will have any adverse impact on their care and treatment. This consideration will be included in the patient's records. Communications will check with the wider MDT to liaise with commissioning groups regarding a patient media opportunity.
- The patient should be appropriately accompanied at all times during an interview, usually by a member of the Communications team and / or one of the care team.
- Should a patient aged under 18 wish to be involved in a media opportunity, consent must also be gained from an appropriate carer or guardian.
- Written confirmation should be obtained in advance so that the patient can withdraw their consent at any time and that their comments will not then be reported.
- While the friends or family of a patient might choose to make a comment to the media, St Andrew's Healthcare will only make public comment concerning an individual patient in exceptional circumstances and if agreed by the Chief Executive Officer and in order to protect our reputation. However no such comment will breach patient confidentiality.

- Comments relevant to the care of a general category of patients can be given in appropriate circumstances - such as dementia services, for example.
- If 'living stories' of patient experiences are used for promotional purposes, including digital promotions such as case studies, they will be provided in such a way that individual patients cannot be identified unless consent has been given and recorded.
- In certain circumstances, patients may consent not to be anonymised. A robust consent process will apply to these situations, and the media opportunity must be agreed by responsible clinicians and families/carers.

6.3. Internet and social media access: patients

- Patients have access to a recently designed patient network/Wi-Fi network.
- In order to obtain access, a member of the clinical team must complete a risk assessment on RiO and complete a subsequent request which details the agreed levels of access.
- This network access comes in high or low access, with patients being assessed for which level will be best suited for them.
- Depending on the access level, certain websites and information categories/genres will be allowed or blocked automatically by our web filter.
- Internet logs and searches are retained centrally as part of an auditable log which can be reviewed if necessary. Changes to the categories, either adding websites into the blocked categories or removing them from the blocked categories, can be performed by the IT department if requested and approved from a clinical standpoint.
- If appropriate, patients can have their access amended by the MDT using the RiO risk assessment and request form.
- For further information, see the Acceptable Use standards.

6.4. Internet and social media access: Guests

- Guests and Visitors can have access to the Guest Wifi network upon request.
- In order to connect to this network, the visitor/guest will need a St Andrew's Healthcare staff member to sponsor their access. Within the Great Hall and Conference Room in Northampton, visitors can also access the event WiFi – this does not require sponsorship from a St Andrew's staff member.
- The member of staff will need to approve access to the Wifi and be responsible for the activities of the individual on the Guest network.
- The network has restrictions in place in order to ensure inappropriate material is not accessed using the Charity's network and the logs are held centrally as an auditable record of internet access.
- For further information, see the Acceptable Use Standards.

6.5. Staff, Governors, and Volunteers and social media

- Staff, Governors and Volunteers are reminded to adhere to the Acceptable Use standards, our Information Security Policy and our Code of Conduct.
- Staff are entitled to state where they work on social media, however this use should adhere to our Code of Conduct.
- Staff should be aware that if their profile says they work for St Andrew's Healthcare, then they are informally seen as a spokesperson for the charity – even if the profile states 'views are my own'.
- All staff are reminded to be respectful of others and adhere to our Code of Conduct.

See Information Security Policy and our Code of Conduct.

6.6. Posting on social media – sharing our content

- Any social media content that has been published by St Andrew's on the Charity's official channels is suitable to be re-shared from personal accounts.
- Staff, volunteers and Governors are reminded to adhere to the Code of Conduct when commenting on this content.

6.7. Posting on social media on behalf of St Andrew's

- If you have agreement from the Communications Team to post, you must follow the following guidelines:
 - Remember our purpose, mission and values and ensure that your post is consistent and appropriate and in the Charity's best interests
 - Ensure that the post is not harmful (the UK Safer Internet Centre defines harmful content in simple terms as anything online which causes a person distress or harm)
 - Ensure that the post complies with any relevant laws, for example UK GDPR laws on publishing personal information or data, copyright, equality or human rights
 - Never share patient details or photos without prior consent
 - Respect the confidentiality of patients and colleagues
 - Protect the Charity's interests and reputation

Failure by staff to follow these guidelines could be considered a disciplinary matter.

When posting:

- Use links to our website and appropriate hashtags
- Ensure you own the rights to all images/videos that you share.

If there's a breach of policy or a post is shared that is damaging to the Charity's reputation, you must:

- Act immediately, deleting or removing the content if that is required, and inform the communications team who can report to any relevant organisations such as the police
- The communications team can advise if the Charity needs to take corrective action or publish a public statement

The Communications Team are not able to approve the creation of new social media accounts for specific teams across the Charity – instead we encourage all staff to share content with the Communications Team so it can be published on our main channels. Any requests for new social media accounts must be approved by our Executive Team, and if approved must be strictly monitored.

6.8. Fundraising on social media

- As part of our strategy we will be looking to do more fundraising for the Charity and will be using social media to amplify our reach. Fundraising on social media has the potential to reach large audiences and can attract wider commentary. All fundraising social media posts which the Charity published on its own corporate accounts should adhere to the [Code of Fundraising Practice](#). The Code outlines both the legal rules that apply to fundraising and the standards designed to ensure that fundraising is open, honest and respectful.

6.9. Campaigning on social media

- As part of our strategy we will also be increasing our influential reach which is likely to include campaigning and lobbying policy makers and political parties on their policies around mental health. We therefore must follow the Government [guidance on campaigning and political activity](#).
- We must also ensure we take particular care around elections in order to remain impartial, and follow the [guidance outlined by the Government](#).

6.10. Safeguarding

The use of social media/networking sites introduces a range of potential safeguarding risks to children, young people and adults at risk. Most individuals use the internet positively, but sometimes they and others may behave in ways that pose a risk. Potential risks can include, but are not limited to online bullying, grooming, encouraging self-harm and people's wellbeing not being promoted.

6.10.1. Safeguarding yourself

If you are using corporate or personal social media/networking accounts for work related activity, you should:

- Ensure that your privacy settings are set up so that personal information you may not want to share is not available to members of the public.
- Have a neutral picture of yourself as your profile image.
- Do not use your work contact details (email or telephone) as part of your personal profile or personal contact details as part of a profile you use for work.
- Keep yourself safe, if you are not sure then do not proceed without advice and support.
- Do not engage in intimate or sexual conversations.
- Ensure any personal pictures you upload are not intimate, compromising or sexually explicit.
- Should any employee encounter a situation whilst using social media that threatens to become antagonistic they should politely disengage and seek advice from the Communications Team and/or their line manager.
- We will report and remove any comments made to our social media sites that breach our standards (for example if the post is racist, discriminatory or abusive).

6.10.2. Reporting safeguarding concerns

Any content or online activity which raises a safeguarding concern must be reported to the safeguarding lead. Please ensure you are up to date with our Safeguarding Policy. Any online concerns should be reported as soon as identified as law enforcement and child/adult safeguarding agencies may need to take urgent steps to support the person. Where a child, young person or adult is identified to be in immediate danger, dial 999 for police assistance.

If you have concerns about a breach in the terms of service for a particular platform, e.g. participation of underage children, nudity in images, use of unsuitable language, grooming, stalking or ideation that could lead to terrorist activities etc. you should report this to the service provider. You should also report this activity to the Communications Team as consideration may need to be taken regarding continued use of that platform.

With regard to personal safeguarding, you should report any harassment or abuse you receive online whilst using corporate or personal accounts to the Communications Team in the first instance. They will advise you what further action should be taken and escalate as required.

Keep yourself and others safe. Do not place yourself at risk and engage in risk taking behaviour on social media platforms.

Key Documents			
Name of form	Where to find the form	Who to complete	Frequency of completion
Patient Consent Guidelines	Appendix 1 to this policy – can be found via Policy A-Z	Responsible Clinician	When a media opportunity arises

7. Roles and Responsibilities

The Head of Communications and Communications team

The Communications team, with input from the Executive team, are ultimately accountable for the Media and Social Media policy. The Communications Team are responsible for the implementation of the Media and Social Media policy, and for monitoring and reviewing the effectiveness of the policy.

Managers

All managers should be aware of this policy and bring it to the attention of all staff in their area. All Managers should keep in mind that that only members of Communications, or approved media spokespeople may comment to the media on behalf of the Charity.

All St. Andrew's Healthcare Staff

Follow policy, procedures and best practice in all relevant behaviours. Ensure that any media enquiries are forwarded directly to the Communications Team. Always ensure that your social media presence adheres to St Andrew's Code of Conduct.

8. Monitoring and Oversight

The Head of Communications is the owner of the Media Policy and is accountable for assurance. Media opportunities and the Charity's response to issues are agreed by the Head of Communications and the CEO.

The Communications Team oversees media monitoring for the whole of St Andrew's and receive all media coverage where mentions of St Andrew's Healthcare appear. This information is shared with the Executive Team, functional directors and senior managers

where appropriate. Action is taken when necessary to correct inaccurate information and protect the Charity's reputation.

9. Diversity and Inclusion

St Andrew's Healthcare is committed to *Inclusive Healthcare*. This means providing patient outcomes and employment opportunities that embrace diversity and promote equality of opportunity, and not tolerating discrimination for any reason

Our goal is to ensure that *Inclusive Healthcare* is reinforced by our values, and is embedded in our day-to-day working practices. All of our policies and procedures are analysed in line with these principles to ensure fairness and consistency for all those who use them. If you have any questions on inclusion and diversity please email the inclusion team at DiversityAndInclusion@stah.org.

10. Training

Media training is provided to Charity spokespeople; this may be a simple briefing or a more thorough workshop session. All media training is arranged by the Communications Team. Any queries should be directed to the Head of Communications.

11. References to Legislation and Best Practice

Fundraising Regulator. (2019). *Code of Fundraising Practice*. [online] Available at: <https://www.fundraisingregulator.org.uk/code>.

GOV.UK. (n.d.). Political activity and campaigning by charities. [online] Available at: <https://www.gov.uk/guidance/political-activity-and-campaigning-by-charities>.

GOV.UK. (n.d.). Charities, Elections and Referendums. [online] Available at: <https://www.gov.uk/government/publications/speaking-out-guidance-on-campaigning-and-political-activity-by-charities-cc9/charities-elections-and-referendums> [Accessed 19 Dec. 2023].

12. Exception Process

Please refer to the exception process [Policy and Procedure Exception Application Link](#)

13. Key changes

Version Number	Date	Revisions from previous issue
1.0	November 2019	Replaces COR28 v5.0 after a Governance Review and split into a Policy and a procedure.
1.1	July 2022	Updated the reference to 'Director of Communications' to 'Head of Communications' within monitoring and oversight section & included terminology for service users
1.2	April 2023	Review date extended by 12months as fit for purpose
2.0	December 2023	Added reference to new Charity Commission guidance on Charities and Social Media, and combined previous policy and procedure onto new policy template

Appendices	
Appendix A	Patient Consent Guidelines