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Social Media Policy

July 2021

(Adapted for RQIA October 2024)



Policy Development Overview

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1.0 Introduction

Social media is now part of everyday life for millions of people and has an impact on organisational, professional and individual reputations. Social media is the term commonly given to Internet and mobile-based channels and tools that allow users to interact with each other and share opinions and content.

Social media is an effective way to target and communicate with the different stakeholders RQIA interacts with. However, there are also associated risks and issues to consider for both individual employees and the organisation. These risks need to be identified and managed to ensure the benefits can be realised in as safe a manner as possible.

In the vast majority of cases, staff use of social media platforms is trouble-free. However, guidance is provided to ensure staff act in a positive way and avoid actions that may negatively affect the reputation of the RQIA or leave themselves open to allegation.

The guidance within this policy applies to all social media channels, not just those specified here.

The Policy has been adapted throughout for RQIA.

2.0 Purpose of Policy

The policy's purpose is to protect the organisation, its staff and service users by minimising the associated business, legal and personal risks.

The organisation uses Social Media platforms and fora as part of its communication with internal staff, and external customers and stakeholders. This policy lays out the good practice in the use of social media, and measures to eradicate unacceptable use.

The policy also ensures that freedom of expression can be maintained and balanced against reputational and information governance risks. Staff are the organisation's best ambassadors so the policy aims to support the responsible use of social media, not restrict it. It should enable staff to get the best out of the available tools whilst maintaining a safe professional environment and protecting both themselves and the organisation.

3.0 Aims

This Policy aims:

- To promote good practice in the use of Social Media and adherence to acceptable standards of use;
- To cascade Social Media as a mechanism to engage with staff and stakeholders, receive feedback and expose to new products and innovative ideas.

4.0 Responsibilities

This policy applies to all staff and for whom the organisation has a legal responsibility. This includes those on an RQIA contract of any kind, those directly employed, students, work experience placements, trainees, agency staff or volunteers.

It is relevant to professional and personal use of social media, in work time and outside of work.

It applies regardless of whether social media sites are accessed using the BSO IT or telecommunications network and equipment or equipment belonging to members of staff or others.

It refers to information on public social media accounts, on private accounts only seen by chosen friends / followers and to information sent through private messenger facilities or platforms.

It includes information in all formats including text, graphics, photographs, audio and video.

Pseudo-sites and alias accounts are within the scope of this policy. This includes sites and social media accounts that are set up in which the profile may not be clearly attributable to a particular person. This may happen in the cases of persons using pseudonyms in profiles, using profiles under the banner of other organisations, clubs or topics.

All staff are responsible for their own compliance with this policy and ensuring that it is consistently applied. **Any breach of this policy may result in disciplinary action being taken.**

5.0 Definitions

5.1 Social Media

In this policy, the term “social media” refers to all communications, internet-based applications (apps) and technologies that allow users to create, share and/or exchange information through social networking sites, online discussion sites, forums, blogs, multimedia sites and other similar platforms.

This includes Facebook, ~~Twitter~~ X (formerly known as Twitter), YouTube, LinkedIn, Instagram, Pinterest, Snapchat, Reddit, Vimeo, TikTok, WhatsApp, Blogs and Messenger, other similar platforms currently available and those which may be developed in the future.

5.2 Official Use

Use with authority from the RQIA and/ or in the course of employment of RQIA.

5.3 Private Use

Use undertaken on an individual basis.

6.0 Codes of Practice

Professional bodies may have issued their own code of practice relating to the use of social media. Staff have a personal responsibility to be aware of codes of practice relating to their professional body, however the organisation’s policy remains the definitive guidance for staff in the use of social media as an employee of RQIA.

7.0 Official Use of Social Media

Official use of Social Media may be performed by the staff in the course of their professional duties with RQIA. This may include, for example, administrating a Facebook page or X feed on behalf of a business unit / department / RQIA as a whole.

7.1 Responses via Social Media to Comments / Posts

When using social media as part of RQIA business the Social Media administrators must perform their duties as laid out in the relevant codes of practice and this policy, s.7.2 below in particular. All responses must be measured and respectful and in keeping with the professional reputation of the RQIA.

7.2 Removal of Material

The following type of material should be removed if posted by the public. If such material is posted by a staff member then the material must be removed and possible disciplinary action taken. Material, comments, links, posts of this nature include those that:

- I. Bring the RQIA into disrepute;
- II. Are considered likely to provoke, attack or offend others;
- III. Are abusive or otherwise objectionable on the grounds of race, sex, sexual orientation, community background, political opinion, nationality, ethnicity, religion, disability, gender identity;
- IV. Contain swear words or other language likely to offend. Offensive includes:
 - pornography & sexually explicit content
 - text & images likely to offend people
 - promotion of, or quotation from hate sites
 - gratuitous violence
- V. Break the law or condone or encourage unlawful activity; Unlawful activity includes:
 - condones or encourages unlawful acts
 - breaches copyright law or encourage others to do so
 - defamatory and/or in contempt of court
 - hacking or other technical disruption to online services.
 - in breach of the Data Protection Act 1998
- VI. Are seen to impersonate someone else / deep fake;
- VII. Describe or encourage activities which could endanger the safety or well-being of others;
- VIII. Are posted anonymously;
- IX. Include links to unsuitable external web sites.
- X. Presents access or safety problems:
 - pay-to-view or other subscription sites
 - sites which might compromise the BT network (e.g.: sites which initiate a download)
 - 18+ sites (e.g.: gambling).

8.0 Private Use of Social Media

It is important to be aware that while you may have a personal account, posting content or views on social media cannot be isolated from your working life. A standard of conduct is expected of all RQIA staff both in work and in their personal time. Even anonymous comments can be traced back to their origin.

A personal social media account i.e. one set up in the name of an individual is not a professional RQIA social media account.

It is not recommended that staff list the RQIA as their current or past employer on their personal social media profiles, the only exception being LinkedIn, which is recognised as a forum for the sharing of professional information.

If a personal social media profile does list the RQIA as the current or past employer, or make reference to a position or place of work, then it is essential that the following wording is also included within the profile to make it clear that the author is posting on their own behalf and not the RQIA:

“Views and endorsements are my own and do not represent the views of the RQIA”.

The above line should be referenced on all social media accounts including X (formerly Twitter), Instagram and Facebook, if you identify yourself as a RQIA employee.

8.1 Guidelines for staff using a Personal Social Media Account

Whether you identify yourself on your personal social media account as a member of RQIA staff, or not, you should always be professional, ensuring you are always honest, accurate, fair and responsible.

Staff should:

- Seek authorisation to speak on behalf of the RQIA, irrespective of level or band
- Never publish confidential information - anything pertaining to service users, patients or other staff or commercially sensitive information
- Never publish photos or footage of service users. Verbal consent is not acceptable
- Never use RQIA or HSC logo or branding
- Never upload compromising photos or videos which impact on professional credibility and could damage the reputation of the RQIA
- Never copy or disseminate internal information

- Never use social media to 'whistle blow'. Ensure you raise concerns through the proper channels in accordance with the RQIA Whistleblowing Policy.
- Always use social media sites for personal use in your own time - social media should never interfere with your job

Safeguarding yourself:

- Ensure privacy settings are set up so that personal information you may not want to share is not available to the public
- Use a neutral profile image - refrain from posting a photo in uniform, particularly as a profile photo as it could be mistaken for an official site
- Avoid using work contact details as part of a personal profile or personal contact details as part of a work profile. Work email addresses should not be put on a personal social networking site, or used as part of login / registration on a personal site
- Never accept a friend request or connection from patients, service users or clients (or their family members) who are only known through work
- Maintain a professional boundary at all times, do not engage with a service user, patient or client about their care or other professional matters either publically or through private message.
- Avoid engaging in intimate or sexual conversations
- Ensure any personal pictures you upload are not intimate, compromising or sexually explicit
- Refrain from making inappropriate comments relating to current legislation or discuss or make political comments
- Abide by copyright, fair use, data protection, defamation, libel, equality, human rights and financial disclosure laws
- Abide by the BSO / RQIA equality and inclusion policies, never publishing posts or material containing racist, sexist, homophobic, sexually explicit, threatening, abusive or disrespectful messages
- Raise any issues through appropriate channels and not through social media. Staff should not air grievances or respond to contentious comments about the HSC, the RQIA, service users, staff or any related topic or react to anything that risks bringing the RQIA into disrepute
- Never make any comment or reaction which could be deemed to be supporting or encouraging safeguarding issues such as bullying, luring and exploitation, theft of personal information, encouraging self-harm or violence or glorifying harmful activities such as excessive drinking or drug taking
- Inform your line manager if any social media or online interaction threatens to get antagonistic or upsetting (you should also disengage from such an interaction)
- Report any harassment or abuse you receive online

Above all, staff should think twice before making a post and carefully consider what they want to say before publishing anything.

Remember that once something is posted on social media it can be retweeted and shared more widely within seconds, and without knowledge or permission. **Once posted, it can be very difficult, if not impossible, to remove it.**

Staff should also be aware that they could face disciplinary action or legal proceedings for posted comments, particularly those aimed at named individuals or organisations that are considered to harm reputation. Negative or inappropriate comments can bring the RQIA into disrepute and make both the RQIA and the employee liable to legal action.

Recent high profile cases of improper use of social media in the UK have resulted in disciplinary action.

Always respect the law and read and understand the terms and conditions of the sites you are using.

8.2 Use of Private Messenger Services

It should be noted that private messenger fora, such as WhatsApp Groups, set up by teams and colleagues are also subject to this policy, whether utilising private or RQIA accounts. Private messenger services should **not** be used for business purposes, except when agreed in times of business continuity.

When private messenger services have been agreed to be used for business continuity, staff engaging in such group discussions should ensure they act professionally at all times and follow the above Safeguarding advice. Staff must also be mindful of not deleting work related information when a private messenger service, for example, a group WhatsApp, has been used, as referenced in the COVID-19 Inquiry. This means that work related messages are subject to the retention, deletion and destruction policies and UK GDPR so that messages may need to be captured and recorded / saved within the RQIA digital archive / records.

8.3 Improper use of Social Media

The RQIA maintains that private use of Social Media is an individual's choice and that an employer should not interfere in the individual's private behaviour. However, there are circumstances in which private use of Social Media can interfere in the staff-employer relationship, and in which the RQIA may need to take action.

Private use of social media may give rise to disciplinary action in cases of:

- Sharing of confidential work-related information, or direct references to work, on personal social media networks.
- Posting of media on personal social media sites / applications of HSC Trust patients and/or relatives.
- Posting inappropriate comments about a staff member, patient or client. This includes discussion of work-related issues, conversations about patients and complaints or comments about colleagues.
- Using social media sites / messaging services to bully or intimidate.
- Using social media in any way which is unlawful.
- Using offensive, sexist, sectarian, racist, hateful or otherwise offensive or discriminatory language which would be considered to be contrary to any BSO / RQIA policies and procedures, e.g. Conflict, Bullying and Harassment Policy, etc.
- Posting digital media on personal social media sites / applications of other RQIA employees taken in a work situation and/or in RQIA uniform, without informed consent.
- Posting digital media on personal social media sites / applications of RQIA equipment or vehicles.
- Using or displaying the RQIA corporate logo on any personal social media site / application unless formal approval is provided by RQIA.
- Publishing your RQIA email address on a personal social media site, or use this address as part of your login / registration on a personal site.
- Using BSO / RQIA networks or equipment to access or update a personal social media site.

**This is not an exhaustive list*

9.0 Non-Compliance

Breach of this policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether BSO / RQIA equipment or facilities are used for the purpose of committing the breach. This applies to private use of social media as well.

Any member of staff suspected of committing a breach of this policy will be required to co-operate with an investigation. This may include removing internet postings which are deemed to constitute a breach in this policy. Failure to comply with such a request may in itself result in disciplinary action.

The Zero Tolerance Policy may also apply as regards non-physical abuse of RQIA staff including agency workers. This too may result in disciplinary action.

Serious breaches may be reported to the PSNI, Information Commissioner, Professional Regulators, or other public authority for further investigation.

10.0 Equality Statement & Monitoring Arrangements

Application of the Policy will be monitored to ensure adherence to the principle of Equality of Opportunity.

The Policy has been screened for equality implications as expected by Section 75 and Schedule 9 of the Northern Ireland Act 1998. Equality Commission guidance declares that the aim of screening is to recognise those policies which are likely to have a significant influence on equality of opportunity so that greatest resources can be dedicated to these.

Using the Equality Commission's screening standards; no significant equality implications have been recognised. The policy will therefore not be subject to an equality impact assessment.

Similarly, this policy has been considered under the terms of the Human Rights Act 1998, and was deemed compatible with the European Convention Rights contained in the Act.

**Business Services
Organisation
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