Social media policy

Policy number POL-002

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Introduction

Social media enables people to connect and exchange information with others who share the same interests or networks. It enhances CPGM's ability to communicate with key audiences and stakeholders however there are some risks. This policy sets out the approach and expectations of committee members and employees when using social media to ensure we maximise the benefits and minimise the risks.

Scope

This policy applies to all employees, committee members and anyone working for CPGM in any capacity including those on a contract, non-contracted, temporary, locum, secondment, agency, student, or volunteer basis.

It applies to all social media and blogging channels, including online comments and discussions forums. The policy applies to all such channels, including those not mentioned by name in this document and new channels that emerge after its approval.

Objectives

- Maximise the benefits of social media for communicating with members, commissioners, partners, media, politicians, and other key stakeholders.

- Minimise the risks of reputational damage to CPGM through inappropriate use of social media by people connected with it.
- Minimise the risks of damage to the professional reputations of CPGM's employees committee members and contractors
- Ensure everyone has clear guidance on what constitutes appropriate and inappropriate use of social media, both in connection with CPGM and in other capacities (including personal use).
- Define the process for creating and managing CPGM social media accounts.
- Clarify the expected standards of behaviour when using social media, and the process for following up on concerns.

Duties and responsibilities

- The Director of Services and Contractor Support is accountable and holds ultimate responsibility.
- The Communications & Engagement Lead (CEL) is responsible for developing and delivering social media policies, strategies and plans and for providing advice and guidance to CPGM staff and members regarding social media. The CEL is also responsible for the day-to-day management of CPGM's social media accounts.
- All employees who have CPGM social media logins are authorised to monitor and post content and engagement (including replies and other messages) on social media accounts.
- All employees, committee members and others within the scope of this policy are responsible for complying with the policy and observing appropriate standards of behaviour when using social media for work or in their personal lives, including taking steps to protect themselves.

- Everyone should be aware that inappropriate use of social media may lead to appropriate disciplinary action in line with their contracts of employment or under breach of governance as stated in the CPGM Constitution.

Definitions

Blogging enables people to share news and opinions with others by posting articles they have written.

Comments/discussion forums allow people to exchange views and ideas, including 'below the line' comments on new articles or blogs and discussion threads on platforms including Reddit.

Social media refers to communications channels that enable information and views to be shared with others. This may be via websites, apps or other tools. Examples include Facebook, Twitter, LinkedIn, WhatsApp, Instagram, Pinterest and Snapchat. This is not an exhaustive list and new social media channels are emerging all the time.

Trolling covers a broad range of activity that could be described as malicious, offensive, intimidating, rude or highly disrespectful. This may include bullying or threats, discriminatory or negative comments, and malicious statements or rumours.

This policy applies to all social media and blogging channels, including those that emerge after its approval.

Policy

Benefits of social media

We embrace social media as a way of communicating and engaging with contractors, pharmacy teams, commissioners, influencers, and other key audiences. It enables us to share and receive news, as well as professional development opportunities.

Risks of social media

We are mindful of the potential risks from social media. Appropriate professional standards must be observed, and appropriate boundaries maintained between healthcare practitioners and patients.

Boundaries between CPGM, personal and other use of social media

Social media has blurred the boundaries between work and personal lives. It is usually easy for someone to identify where an individual works, their profession and/or their other interests by putting information together from different channels. It's important to remember that many social media networks draw information from email history and phone contacts and use this this to 'suggest' individuals they may know or want to follow.

Everyone must ensure that use of social media in their lives outside CPGM does not conflict with or jeopardise our reputation. For that reason, this policy applies to all social media including in connection with their CPGM work, another role, or their personal lives.

Conduct when using social media:

Assume permanence

The key principle is to assume that anything posted on social media can be read by anyone anywhere in the world. Once posted, items can never be totally deleted – someone may have taken a screengrab of it, for example, and shared it elsewhere. Privacy settings may not be failsafe so should not be totally relied on. For this reason, employees and committee members should never post content that could bring CPGM into disrepute.

Employees should also be mindful that their past internet and social media history may be linked back to CPGM. It's advisable for people to periodically review their past posts

and remove anything they no longer feel is appropriate – while this may not guarantee content is deleted from the web entirely, it reduces the risk to the individual and CPGM.

Data protection law now offers certain users the 'right to be forgotten' by internet search engines – they can ask search engines to remove results that include their name results if they have good reason to believe the content is "inadequate, irrelevant, no longer relevant, or excessive". However, there is no guarantee that requests will be accepted. Further information is available at https://www.google.co.uk/policies/faq/

Be respectful

Something that the person posting may intend as a critique, joke, teasing or mild sounding-off may be interpreted very differently by the recipient or others reading it. It may be perceived as offensive, unprofessional, or even as trolling.

Employees and committee members are expected to be professional and respectful of others – including individual characteristics (e.g. race, gender, age, sexuality, faith, disability, and marital status) and others' views and opinions – when using social media.

Stay secure

It's important to be mindful of IT security when using social media. The usual principles of not sharing passwords with those not authorised to have them, logging out of shared devices, and locking screens/devices when away from them apply.

Personal opinions / conflicts of interest

Posts may be interpreted by others as representing CPGM's view, unless clearly stated otherwise. This includes comments made in discussion forums or below online news articles and blogs.

Everyone should ensure it is clear whether a post or account is on behalf of CPGM or another capacity (e.g. personal/other interest).

Any conflicts of interest must also be made clear when using social media.

Professional boundaries

Health professionals must maintain appropriate boundaries with patients and comply with safeguarding and patient confidentiality standards at all times. The Royal Pharmaceutical Society stresses that pharmacists should "maintain proper professional boundaries in relationships and interactions with patients and at all times respect the confidentiality of others".

They advise pharmacists not to give personal medical advice online, with the exception of online pharmacies responding to their patients' queries. Instead, they recommend encouraging the person to seek advice face to face from a pharmacy.

Pharmacists may also wish to think very carefully before accepting friend/follower requests from patients for their personal social media accounts (as opposed to pharmacy accounts). This is particularly so in the case of requests from under-18s and vulnerable adults.

Copyright, accuracy, and legality

Make every reasonable effort to ensure information that they post is accurate and factually correct. Where information is later discovered to be inaccurate, it must be deleted and/or corrected as soon as possible.

The laws of copyright, defamation, data protection, equality and diversity, and other relevant areas apply to social media. Copying content from elsewhere and sharing it on social media without permission is a breach of copyright – this includes online news sites, images and photos, and copying other people's tweets and social media posts. This doesn't apply to retweets or re-posts of the original post.

Personal use of social media while working for CPGM

Employees can use CPGM equipment or their own devices to access social media for personal use during break times provided they follow the policy and do not post or access inappropriate content.

Personal use of social media at other times during their CPGM working hours is subject to agreement with their line manager.

Process for establishing/deleting CPGM social media accounts

The CEL is responsible for CPGM's social media presence. This includes the creation and deletion (including closing and archiving) of its social media accounts.

The CEL must approve the creation or deletion of CPGM social media accounts after the date of this policy. If urgent decisions or actions are required in the CEL's absence, then the Executive Leadership Team or Chair's approval must be sought.

Reporting inappropriate content and behaviour

Inappropriate content/behaviour by CPGM staff

If an employee comes across information that contravenes this policy, they should inform their line manager. If their line manager is implicated in the issue in some way, they should contact the Chair and/or Governance subcommittee.

Inappropriate content/behaviour by an external individual or group

If an employee comes across content posted to the social media accounts that they believe is offensive or inappropriate, they should inform the CEL who will decide how to respond. In the CEL's absence, then the Executive Leadership Team/Chair should be contacted and/or Governance subcommittee.

Action may be taken to block or mute someone, ask the relevant social media networks to remove content, or contact other appropriate authorities – for example, the police in the case of threats of violence or other criminal behaviour.

Monitoring social media

The CEL takes responsibility for monitoring CPGM social media. They will be supported by the CPGM team. Information and analytics will be used to enhance social media

activity, communications, and engagement more broadly, and its reputation and influence.

Equality impact assessment

This policy has been assessed for the risk of disproportionate impact on individuals on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, and sexual orientation. No detrimental impact was identified.

Version control

Version and date	Author	Changes made
1: 14th December 2016	Emer Scott	n/a
2: 15th November 2018	Emer Scott	Amended "the LPC" to "GMLPC" throughout Inserted missing text in definitions on page 3 Deleted contact details on page 5 for CEO and HR sub-group Chair as these are subject to change over time Updated links to social media guidance from RPS and BMA
3: 13th November 2023	Janice Perkins	Updated to CPGM Minor amendments to wording
4: 8th February 2024	Elaine Hand-Griffiths	Rebranded
5: March 2025	Janice Perkins	Updated to reflect new job titles and escalation process
6. March 2027		