

# Media and Social Media Policy

Version No: 1

**Document Summary:**

The purpose of this document is to provide guidance to all Trust employees on media/social media/networking on the internet. It seeks to give direction to staff in the use of these tools, understand the ways they can use social media to help achieve business goals and best represent themselves online.

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**The intranet version of this document is the only version that is maintained. Any printed copies should therefore be viewed as “uncontrolled”, as they may not contain the latest updates and amendments.**

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## Document Control

[Author to complete all sections apart from Section 4 & 5]

Section 1 – Document Information	
<b>Title</b>	Media and Social Media Policy
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1 PD	09/11/2021	Minor amendment to harmonise with S&O all references to STHK removed and replaced with MWL
	Click here to enter a date.	
	Click here to enter a date.	
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Section 4 – Approval – <i>To be completed by Document Control</i>	
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## 1. Scope

This policy applies to Mersey and West Lancashire Teaching Hospitals NHS Trust (MWL) employees (including those of Lead Employer), volunteers, bank, agency and partner staff based at all Trust sites and other sites including community services, patient's homes and anywhere MWL provides services, here on in known as staff.

The policy sets out the standard that should be followed by staff when dealing with the media or publishing content to social media websites.

This document is not a social media strategy, or guidance on how to use each individual social media tool and platform. Each business area should assess the value of using social media in an official capacity and follow this policy.

This policy also contains a section about personal use of social media and guidance on the appropriate personal use of it.

## 2. Introduction

'Media' refers to the means of communication such as newspapers, radio, and TV, that provide the public with news, entertainment, etc., usually along with advertising.

'Social media' or 'social networking' are the terms commonly used to describe websites and online tools which allow users to interact with each other in some way by sharing information, opinions, knowledge, interests, encouraging participation and engagement.

To prevent misrepresentation and avoid errors, it is important that as an organisation and individual members of staff, the Trust manages and aims to prevent potential risks through a consistent approach.

## 3. Statement of Intent

The purpose of this policy is to help protect the organisation, but also to protect its interests and to advise employees of the potential consequences of inappropriate behaviour and any content that might be shared whether acting independently or as a representative of the Trust.

### 3.1 Policy aims

The aims of this document are:

- Provide clarity to staff around interactions with the media and on the use of social media tools as a representative of the Trust and give them the confidence to engage effectively
- Ensure that the organisation's reputation is not brought into disrepute and that it is not exposed to legal risk; and
- Ensure that internet users are able to distinguish official corporate Trust information from the personal opinion of staff.

The Trust's identity is largely formed by what it does – treating illness and injury and promoting health. However, communication is also important. It must express the same values and behaviours as well as professionalism and quality.

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What is portrayed by the media and written online affects what people think and feel about the Trust and the National Health Service as a whole. The good reputation of the Trust is truly deserved and sits well within the local and wider community and must therefore be protected as a priority.

It is therefore important that staff understand how the media and social media can help the Trust achieve its business objectives in a professional and responsible way.

## 4. Definitions

Definition	Meaning
<b>Social Networking</b>	Online media sites used for wider communications, Facebook, Twitter, LinkedIn, YouTube, Instagram, TikTok, Online Social Networking, WhatsApp
<b>Media</b>	All forms of media including; TV, Radio, Print, Web and social media

## 5. Duties, Accountabilities and Responsibilities

### 5.1 Chief Executive

The Chief Executive of the organisation has overall responsibility for the strategic and operational management of the Trust including and ensuring that Trust policies comply with all legal, statutory and good practice guidance requirements.

### 5.2 The Information Governance Team

The Information Governance Team is responsible for advising on strategic direction, the development of the policy and guidance for the Trust, and also operational support to the Trust on Information Governance compliance.

### 5.3 Human Resources Department

The Human Resources Department is responsible for advising managers, staff side colleagues and staff members on the appropriate personal use of social media accounts by staff and advising on what constitutes social media misuse by staff.

Human Resources is also responsible for supporting case managers, investigating officers and disciplinary panel members in events where personal use of social media by staff could be deemed as bringing the Trust into disrepute. In these instances, the Trust Disciplinary Policy should be referred to.

### 5.4 Line Managers

Line managers are asked to take an active role in any social media request and work with colleagues to ensure quality of content is in keeping the Trust's values and behaviours expectations and managers' standards and follows the social media policy and content guidelines. It will be the Line Manager of the particular service/department who decides which

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two members of staff within the team will become social media administrators. Line Managers will also approve content in a social media planner template before it is posted online.

## 5.5 The Communications Team

The Communications Team will manage the content of all the corporate social media accounts and all corporate content will be approved by the Assistant Director of Communications.

The Social Media/Marketing Co-ordinator will be the first point of contact if staff want to post information on the corporate social media channels. If a member of staff wishes to establish a Trust social media presence to highlight certain services, this can be done through a social media site request form. (Appendix 1). The team will offer social media guidance through the Social Media Co-ordinator. All media/press requests received through social media should be referred to the head of the department.

The Communications Team can be contacted Monday to Friday, 9am-5pm on 0151 430 2505, ext. 2505 or [communications@sthk.nhs.uk](mailto:communications@sthk.nhs.uk)

Outside of these times, please contact the Director on call through switchboard 0151 426 1600 who will contact the Communications Team as required.

## 5.6 The Complaints and PALS Teams

The complaints and PALS team should be contacted when a patient complaint is received on a social media platform to check if they already have a record of the complaint and then appropriate feedback and approved lines should be given in line with the complaints and feedback process chart as per Appendix 4. Any responses to patient complaints should be approved by the Communications Team.

## 5.7 Medical Photography Team

Images taken for social media must be taken by a member of the Medical Photography Team or with a Trust approved camera. If patient photography is required, a consent form must be completed before commencement of photography. All images must be checked by the Communications Team prior to upload to any social media account.

On occasion, the Communications Team may request a staff member to take a photograph on their own device, at no time will this include photography of patients or any image that may breach patient confidentiality. Any staff featured in the photograph must give their permission for the image to be used by the Communications Team either internally within the Trust or for external publication.

## 5.8 All Staff

All staff, whether permanent, temporary, casual or contracted, including students, contractors and volunteers are responsible for ensuring they are aware of the Media and Social Media Policy and how they should conduct themselves online whilst a member of staff of the Trust. This applies to when staff are both on and off duty. It is the responsibility of the individual staff member to ensure that they have the appropriate privacy settings in place. Different social media

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services have different options and abilities to limit the way your posts are shared. It's important to understand how the settings work for the services that you use.

## 6. Media

News media is available through digital, broadcast and print platforms. Each has the power to influence and offers MWL an opportunity to raise awareness of the organisation and its successes and achievements.

Journalists and editors have to make judgements about what is in the public interest, based on the information available to them, their editorial policy and their target audience. They have the right to make those judgements within the bounds of the law. We should therefore consider the media both as a channel to get our information across to the general public and also as an important target audience in their own right.

### 6.1.1 Proactive media

The NHS is a publicly funded service and is accountable to its public. As a public service, the NHS is expected to be open and transparent in its dealings with those who use its services and with the general public. Proactive media relations are part of that openness and transparency.

The Communications Team maintains relationships with mainstream and specialist media, both local and national, and will seek opportunities to place stories of interest about MWL its people and the high-quality care it provides. All members of MWL staff are encouraged to contact the Communications Team with suggestions for stories or feature items.

### 6.1.2 Reactive media

The media approaches MWL for comment on a range of topics. Sometimes their interest has been triggered by a patient/relative who have approached the media directly with a complaint. Other times the media may be seeking a response to a national issue or something that has happened locally – for example an outbreak of norovirus or a condition check on someone involved in a serious accident.

All media enquiries are dealt with by the Communications Team. Any member of staff who becomes aware of a situation that might attract media interest must let the Communications Team know immediately and share all relevant information (see section 8 'Contacting the Communications Team'). The information will not be released in its entirety to the media; however, it is critical that the Communications Team are aware of all the details to ensure that any statement issued is informed by the full details and counteracts further enquiries and clarifies any potential misunderstanding.

### 6.1.3 Media statements/interviews

All media statements are approved by the Chief Executive or a member of the Executive Team.

Only staff requested or authorised by the Communications Team and/or member of the Executive Team is permitted to talk to the media, take part in media interviews or contribute to a media

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statement. Staff must not pre-plan their own media without the agreement of the Communications Team.

#### 6.1.4 Media relations

It is vital that all calls from the media are handled in a professional, consistent and appropriate way. The Communications Team should be alerted to any media interest and will manage all media enquiries and deadlines.

If a member of staff receives an unplanned call from a journalist, they should:

- Take a note of the journalist's name and phone number
- Confirm that someone will phone them back promptly
- Contact the Communications Team immediately and share the details
- If this is out of hours, contact the General Manager on call who will contact the Communications Team

Occasionally, when responding to media enquiries, there may be times when it is not appropriate for the Trust to provide information. Reasons for declining to provide a statement or a request for a spokesperson for interview include:

- Patient confidentiality
- Because information is being prepared for publication at a later date (for example a strategic document or the report of an inquiry)
- Because taking part would impact adversely on the reputation of the organisation

#### 6.1.5 Media spokesperson

MWL aims to be open and transparent, and it is important that all communication with the media is managed so that patients, staff and MWL are protected as much as possible from adverse media attention.

The Communications Team, in consultation with the Chief Executive and the Executive Team, will agree individual spokespeople in response to requests for interview. Only these agreed spokespeople are authorised to speak to the media on behalf of MWL. If other members of staff wish to speak to the media, they must contact the Communications Team in the first instance.

Any staff member who is considered to have potentially threatened the reputation of the organisation or who provides inaccurate information is in breach of Trust guidelines and may be subject to disciplinary proceedings. To ensure this does not happen, the Communications Team must always be informed and involved before any contact is made with the media.

The Communications Team will provide clear guidance and support to any staff member authorised to speak to the media.

It is recognised that staff have other roles in public life that may require them to provide media statements e.g. a local councillor, however, as members of MWL staff it is essential that the advice of the Communications Team is sought to avoid any possible conflict of interest.

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### 6.1.6 Confidentiality / Data Protection Breaches

Under normal circumstances, there will be no basis for disclosure of confidential and identifiable information to the media. However, there will be occasions when NHS organisations and staff are asked for information by the media about individual patients or, in response to particular circumstances where it is felt that disclosure with the patients' consent is justifiable.

There may be some occasions when disclosure without the patient's consent may be permitted with the authority of the Chief Executive or member of the Executive Team who may need to seek legal advice. For example:

- In distressing circumstances, e.g., following a fire or road traffic accident when the patient is known to be in the hospital; their identity is already known to the public and where consent has been obtained

Only the Communications Team are permitted to respond to condition check requests from journalists and this will be done in agreement with the Chief Executive or a member of the Executive Team.

The explicit consent of the individual patient(s) concerned should be sought prior to disclosing any information about their care and treatment, including their presence at Mersey and West Lancashire Teaching Hospitals NHS Trust. Where a patient is not competent to make a decision about disclosure, the views of family members should be sought, and decisions made in the patient's best interests.

No details of injuries should be provided or confirmed. Examples of condition definitions include serious, satisfactory and stable.

In circumstances where a patient or a patient's relatives are complaining publicly and unfairly about treatment and care provided, and if they have put confidential information in the public domain and thus lost the element of confidentiality, then a response from the organisation might be justified. For example, to correct wrong information and to ensure that NHS staff and organisations are not unfairly and publicly maligned.

However, disclosures need to be justified on a case-by-case basis. Disclosure should be limited to the minimum information necessary and should only be permitted to be disclosed by an authorising manager after discussion with the Chief Executive or appropriate member of the Executive Team who may need to seek legal advice.

Where it is believed personal identifiable information has been shared inappropriately the Information Governance team will be informed. Under Data Protection legislation we are required to investigate any breaches that concern personal data and consult with the Information Commissioner's Office (ICO) where it is believed the data breach has caused harm to the individual concerned.

### 6.1.7 Working in partnership

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The Communications Team works in partnership with health and social care providers and with other organisations e.g. Medirest/Vinci FM to provide content and comment for new releases and media enquiries.

No member of staff should agree to liaise with the media or provide quotes, comments or endorsements through another organisation that will be used in a media statement or media campaign without first contacting the Communications Team.

MWL will work with partner organisations to develop a shared, corporate and cohesive approach and response to media enquiries to ensure responses are consistent and unified to ensure public confidence in its services and in the wider NHS.

MWL will not make public statements that might undermine public confidence in itself or, by implication, in partner organisations or the NHS as a whole.

### **6.1.8 Rights of staff side representatives of recognised trade unions or staff associations**

This Policy does not restrict the right of elected staff side representatives of recognised trade unions or staff associations to express their views through or to the media directly.

Elected staff side representatives of recognised trade unions or staff associations are fully entitled to make comment on behalf of their staff association or trade union. They are not able to make comment on behalf of, or representing the Trust.

## **6.2. SOCIAL MEDIA**

Social media is a powerful tool and is an important way for people to share opinions, information and knowledge. It also offers everyone the opportunity to be a 'journalist' and say anything to a public audience. Often these authors are offering only their personal views without any research or right to reply.

This policy covers all current and future social media platforms, including:

- Twitter (currently rebranding to X)
- Facebook
- LinkedIn
- YouTube
- Instagram
- Threads
- Snapchat
- TikTok
- WhatsApp

Along with other social media blog and podcast sites.

### **6.2.1 Responsibilities**

The Communications Team has lead responsibility for the overall strategy, programme, content, messages, posts and tone of all MWL corporate social media sites.

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The policy makes staff and Trust contractors aware of their personal and corporate responsibilities when using social media, in private and when at work.

Staff are encouraged to engage online with MWL by following, liking, subscribing etc. to MWL corporate media channels and by sharing updates posted on MWL pages. However, staff should refrain from answering any queries or reacting to comments underneath official posts in a professional capacity. Any comments or responses should be responded to by the Communications Team.

No social media sites or pages relating to the Trust or that might be considered and viewed as official MWL corporate social media accounts should be set up by staff, volunteers or anyone working for MWL without prior discussion and agreement from the Communications Team.

The Trust recognises that all staff are entitled to use social media in a personal capacity. However, they should follow the same behavioural standards online as they would in their everyday roles and abide by their legal and ethical duties to protect patient and colleague confidentiality.

Staff who post comments or information online regarding MWL, or the NHS in general, are personally responsible for their actions and the online content they have created.

### **6.2.2 Security and privacy**

It is important that the potential impact of posting content on social media, both in a personal and professional capacity is always taken into consideration. Information shared on social media is in the public domain and this activity may result in your comments being permanently available to patients, colleagues, MWL, future employers and/or open to being republished in other media.

Staff are encouraged to:

- Check their security/privacy settings on personal social networking sites to ensure that information is only visible to the people who they want to see it
- Not allow patient or colleagues to post any photographs or videos of them at work

Staff are reminded that even with the highest privacy settings, posts and comments are still judged to be 'public' once posted on social media and can easily be copied and shared outside of the staff member's personal account.

### **6.2.3 Confidentiality / Data Protection Breaches**

Staff using social media are reminded:

- That libel, defamation, copyright and data protection laws apply. This means that members of staff should not disclose information, make commitments or engage in activities on behalf of MWL without the knowledge of the Head of Communications and with permission to do so
- Not to make any personal or derogatory or abusive comments about patients or colleagues as this could result in legal and disciplinary action against them and MWL

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- Not to post or share any personal identifiable information about patients or colleagues, including any relatives
- Not to post or share photographs or videos of yourself at work or in your work uniform unless sharing official MWL messages

Where it is believed personal identifiable information has been shared inappropriately the Information Governance team will be informed. Under Data Protection legislation we are required to investigate any breaches that concern personal data and consult with the Information Commissioner's Office (ICO) where it is believed the data breach has caused harm to the individual concerned.

### 6.3 MOBILE DEVICES

It is recognised that mobile phones and other devices such as tablets are essential to maintain communication with friends, family and loved ones when someone is in hospital. In line with the principles of patient choice, MWL supports the use of mobile phones in our hospitals and in other public areas where MWL services are delivered as long as this does not affect:

- The safety of patients or other people
- Patients' privacy and dignity
- The operation of medical equipment

The use of mobile devices is allowed in the majority of public areas including:

- The hospital entrances, reception areas and main corridors
- Communal areas including the restaurants
- Non-clinical areas on wards where direct medical care is not given

Signs are in place for areas where the use of mobile phones and devices is not permitted.

Photography and filming is strictly prohibited in clinical areas. Posters are displayed with guidance for patients and visitors on the use of mobile phones or devices for filming and photography in respect of the privacy of patients, staff and visitors.

Filming of births is strictly prohibited, although the Trust acknowledges that parents may wish to take photographs or video footage following the birth of a child. This is at the discretion of the staff present and permission must be sought before any filming takes place within the Maternity Unit. Any photography that includes staff members must be with the full consent of those involved.

To protect confidentiality, patients and visitors must not take pictures or video of other patients, visitors or MWL staff without their permission and be mindful that even when permission has been gained that there are no other individuals in sight who have not consented.

Patients and visitors must not post personal or medical details about other patients and staff on social media without their permission.

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Anyone with any concerns about someone taking photos or videos is encouraged to speak to the nurse in charge or a staff member.

## 6.4 MAJOR INCIDENTS

Almost any major incident will generate huge media interest on a local, national and even an international scale.

Comment and details about a major incident may be shared on social media often within just a few minutes of a situation happening, although the details shared will be unverified, it may initially be the only source of information for the media, patients and relatives.

Digital and broadcast media are sometimes the only source of information for the public in an emergency. In the early stage the media may well be the source of information for the families of those involved. Media outlets reach millions of people, so it is important to ensure they have accurate, timely information.

Media liaison will be co-ordinated through the Communications Team as part of the Major Incident Policy. Usually, in a major incident, statements and interviews will be given by the Chief Executive and members of the Executive Team, supported by senior colleagues and advised by the Communications Team.

During such times, MWL will adopt as open and helpful a stance as possible and practical with reporters. We will seek to explain the situation, describe the impact (if any) on services and staff and set out what action is being taken to resolve any outstanding issues.

## 6.5. VIP AND CELEBRITY VISITS

Occasionally, MWL will be asked if a high-profile personality, organisation or national charity and representatives can visit our services and meet patients. Celebrity visits can play a significant role in enhancing patient experience and motivating our staff.

Although we aim to accommodate these visits where possible, it must not compromise the safeguarding of all adults and children, the privacy and dignity of patients, families and staff, or have a detrimental effect on the delivery of clinical care.

All requests for celebrity visits to wards or individual patients must be made through the Communications Team. If an individual or team is approached privately by a celebrity or VIP, the visit must be approved by and organised through the Communications Team.

The Communications Team will oversee visits and, if appropriate, enable the media to attend. This could include TV, radio and print media.

All VIP, celebrity, charity representatives or groups of visitors will be accompanied at all times by a Trust representative with prior agreement from the Communications Team. In accordance with the Trust's Official Visitors Policy, visitors must never be left alone or unsupervised with a patient, whether the patient is a child or an adult, and the correct visitor log must be completed and recorded with the details of each visitor. Please refer to the Official Visitors Policy for further

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details.

All scheduled visitors will be met at main reception or an agreed location and escorted to the pre-arranged clinical area where the visit will take place.

Requests by VIP, celebrity or charity visitors to bring their children with them on the visit will be considered on a case-by-case basis.

If the celebrity is under 18 years of age, the visit will be at the discretion of the Chief Executive or a member of the Executive Team in consultation with the Assistant Director of Communications and will be chaperoned.

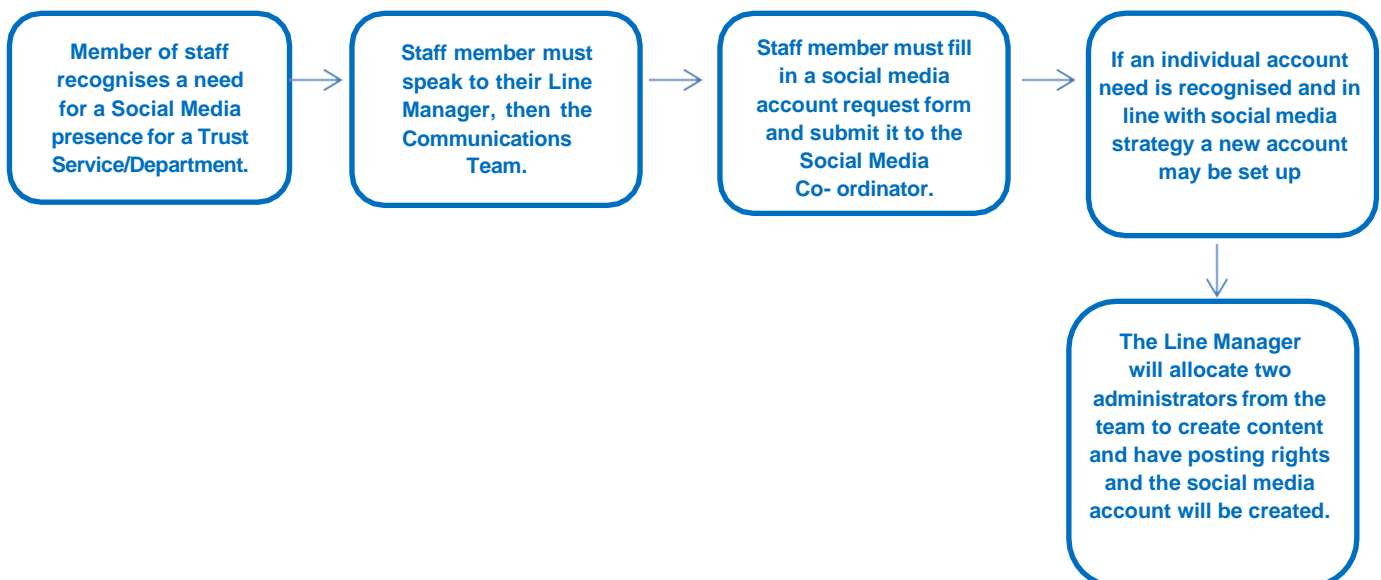
## 6.6 REQUESTING A SOCIAL MEDIA PRESENCE

If a member of staff wishes to establish a Trust presence on Twitter (X), Facebook, LinkedIn, Instagram or any other social networking site you must discuss your proposal with the Communications Team and Line Manager in the first instance, to ensure that it is appropriate and in-line with the organisation's Social Media Strategy.

Staff can apply to create a social media site by making an application through their Line Manager using the Social Media Request Form (Appendix 1). Completed copies should be digitally submitted to the Social Media/Marketing Co-ordinator.

Requests should outline how the activity will benefit the patients and/or colleagues both within the Trust and the wider healthcare community and/or the organisation as a whole.

Given the time and resource involved in effectively managing a presence on a social networking site, there must be a demand from an audience for engagement activity and staff should be able to illustrate team and departmental commitment to the project.



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Starting a Facebook or Twitter account and only submitting a hand full of posts will be seen in a poor light and may lead to approval being rescinded and the site being closed down.

The Communications Team will keep a register of all the Trust's approved social media sites. This list is reviewed on a monthly basis to ensure sites are providing regular and relevant content that adds value. The review will consist of the Assistant Director of Communications and the Social Media/Marketing Co-ordinator reviewing the approved social media site and assessing the posts and threads published by the account admin. Any areas for concern will be brought to the attention of the manager who approved the request of the social media site. Any sites falling short of agreed standards will be reported to the Line Manager who approved the initial site. Approval may be withdrawn, and the site closed if a secondary review within an agreed time period shows little or no improvement.

As a social media administrator, the member of staff is responsible for ensuring that:

- Members/audience can easily tell whether the group/page is open to all or only to invited individuals be they Trust staff or members of another stakeholder group.
- The purpose of the social media platform is clearly laid out for all to see.
- A disclaimer is displayed prominently on the site, for example: The views expressed in this group/page/website/account are those of the members and do not necessarily reflect the views of the Trust.
- The Social Media/Marketing Co-ordinator is fully aware of the social media account and has an up-to-date link to the group/page, knows who the current administrators are and is made aware of any significant changes to its administration and/or purpose.
- The Social Media/Marketing Co-ordinator has a record of the email address, login username(s) and password(s).
- That all content is approved by their own Line Manager and if approved lines are needed these come from the Assistant Director of Communications.
- Consent forms are completed for anyone featured in the social media content.
- That only approved content is posted on their service/department social media sites and all social media processes and guidelines are followed.
- That if any feedback is abusive or they think they may be hacked they contact the Social Media and Marketing Co-ordinator immediately.

If using social media as part of a job role is approved and a member of staff is made an administrator of a Trust social media account, the right tone of voice for each platform should be used and staff should always communicate in a professional manner.

As a member of staff of the Trust, the approach must be part of a comprehensive patient, carer and public engagement strategy and staff must understand social media is a public environment and rules on patient confidentiality should reflect this. Information regarding social media content can be found in the social media content guidelines (Appendix 2) and social media processes (Appendix 3 & 4).

Assistance in setting up a social media account will be provided by the Social Media/Marketing Co-ordinator.

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## 6.7. PERSONAL USE OF SOCIAL MEDIA SITES

It is important for staff to understand what is and what is not acceptable to be published online. There is a need to ensure Trust staff are aware of their responsibilities as a member of staff and a professional when using social media appropriately and safely.

Staff should be aware that the Trust reserves the right to use legitimate means to scan the web, including social networking sites for content that it finds inappropriate or any associated breaches of this policy. The Trust also reserves the right to monitor staff usage of social networking sites in work time.

Staff who make reference to the Trust (or in the case of Lead Employer Trainees/ Student Physician Associates their Host Organisation/ / University) within social media accounts must always state that they are tweeting/ sharing updates in a personal capacity. Staff who do not directly identify themselves as Trust staff members when using social networking sites for personal purpose should be aware that the content they post on social media sites could still be construed as relevant to their employment with the Trust.

### 6.7.1 What must not be posted on social media

Trust staff using social media **must not**;

- Post online content, including inappropriate images (and take part in online actions e.g. like or share) that is inaccurate, defamatory, harassing, threatening, personally insulting, fails to show dignity at work or may otherwise be illegal. This includes making derogatory comments about patients or potential patients and colleagues (including those in host organisations/ /universities for the Lead Employer and Health Education England.
- Disclose sensitive or confidential information about the Trust and its partners (host organisations/ universities, Health Education England, local authorities and social services). This also applies to information about other staff, patients, commercial suppliers, other organisations, and the Trust's business activities.
- Share identifiable information about patients (including their names). This also includes those in host organisations/ /universities, for the Lead Employer and Health Education England. Although individual pieces of information may not breach confidentiality on their own, the sum of published information online could be enough to identify a patient or anyone close to them.
- Post or share images that contain patients or images that have been taken inside of or, in the grounds of, or of Trust and partner's premises, or place misleading, malicious, or derogatory comments to images or references that would damage the reputation of, or misrepresent the Trust, or cause distress to its patients or any other member of staff.
- Connect with patients on personal social media accounts. If any patients contact staff members about their care or other professional matters through personal social media accounts, staff must indicate that they cannot mix social and professional relationships/communication and where appropriate either direct them to the Trust's

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corporate/individual services social media accounts or give them professional contact details.

- Provide any medical advice or diagnosis to other users. Codes of professional conduct should be followed at all times.
- Post any corporate information before it has been officially announced on the Trust's corporate social media accounts. These official updates can then be shared but must not be altered in any way.
- Use any corporate logos or identifications associated with the Trust. These may only be used where prior permission has been obtained from the Communications Team.
- Share details of the Trust's implemented security or risk management arrangements. All these details are confidential and could lead to a serious breach of security occurring.
- Share personal contact details of any members of staff including phone numbers and email addresses. Department contact numbers only can be given on Trust social media accounts. Please refer to the Staff Code of Confidentiality before sharing any information.
- Use a Trust e-mail address to sign up to social media sites for personal use.
- State or imply that you are speaking on behalf of the Trust. If confusion is likely to arise, you may wish to use a disclaimer that clarifies things, for example 'these are my personal views and not those of my employer'.

These examples are not exhaustive- the standards expected of staff do not change because they are communicating through social media rather than face to face.

Staff have a duty of confidentiality to patients, carers, colleagues and friends which does not stop at the end of the working day.

## 6.8 Social Media Legal Implications

It is critical that staff comply with this policy in their use of social media sites. Failure to do so will lead to their conduct becoming subject to investigation under the relevant disciplinary procedure if it brings the Trust's reputation into disrepute or exposes the Trust to potential liabilities.

Staff are ultimately responsible for their own online behaviour. Inappropriate use of social media both in or outside the workplace, for example making unjustified negative comments or defamatory comments about the Trust, its clients, or staff, will lead to employees being subject to these investigations.

For employees any serious breach will be regarded as a matter of alleged gross misconduct which could lead to the employee being dismissed.

If a casual member of staff (locums, bank staff, volunteers) or a contractor is involved in a significant breach this will lead to the Trust terminating its contractual relationship with the

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individual or organisation or ceasing to utilise their services.

Significant breaches of this policy may include the need for the Trust to refer the matter to the individual's professional body, for Lead Employer Trainees/Student Physician Associates their Host Organisation/ /University or the individual being subject to legal action for breach of data protection, defamation of character or even criminal proceedings.

All staff should bear in mind that information they share through social media, even if they are on private spaces, could be subject to copyright, The Data Protection Act, The Safeguarding of Vulnerable Groups Act 2006, The Computer Misuse Act and any other relevant legislation.

Staff should be aware that there is an implied legal duty of trust and confidence between an employer and employee. It is possible therefore that any inappropriate use of social media both in or outside the workplace, for example by making unjustified negative comments or defamatory comments about the Trust, its clients, or staff, could result in disciplinary action if it brings the Trust's reputation into disrepute, or exposes the Trust to potential liabilities.

The Trust recognises and upholds the right of staff to make public interest disclosures ("whistleblowing"- see the Raising Concerns Policy) when necessary but would not envisage that such disclosures could be justifiably made using social media.

If a member of staff thinks that they are being harassed or are a subject of defamation through social media they should report it to their Line Manager or a member of the HR Team.

## 6.9 MWL Closed Staff Facebook Group

The MWL Closed Staff Facebook Group is a closed group set up on Facebook for Mersey and West Lancashire Teaching Hospitals NHS Trust staff only. The group is an online community for staff to share news, ask questions and contribute positively towards conversations.

The MWL Closed Staff Facebook Group has its own set of group rules which must be followed at all times own. Please see Appendix 9.

For more rules and guidance please read the MWL Closed Staff Facebook Group FAQs (Appendix 8), and the 'Dos and Don'ts poster (Appendix 7).

In regard to photography for the MWL Closed Staff Facebook Group, it is possible for staff to take images on personal devices and post pictures of themselves and colleagues into the group as long as;

- It is appropriate and relevant content to the group
- All staff within the picture have given consent
- The pictures do not feature patients/ patient information or sensitive information which could damage the Trust's reputation
- Breach security measures

Staff **MUST NOT** post photographs taken on Trust premises onto their own personal social media accounts.

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## 7. Training

There is no mandatory training associated with this policy. If employees are to be responsible for cascading corporate information guidance and training will be given.

There will be regular communications about the need for staff to adhere to this policy issued through numerous methods of communication using a variety of Media.

## 8. Monitoring Compliance

The table below outlines the Trust's Key Performance Indicators and monitoring arrangements for this policy/document. The Trust reserves the right to commission additional work or change the monitoring arrangements to meet organisational needs.

### Key performance Indicators of the Policy

Describe Key Performance Indicators (KPIs) Must reflect	Frequency of Review	Lead
Build a strong online community.	Weekly/Monthly Report	Social Media/Marketing Co-Ordinator  Any Trust social media Administrators
Help staff, patients, public and all other stakeholders engage with the Trust online.	Weekly/Monthly Report	
Keep staff patients, public and all stakeholders correctly informed about the Trust.	Weekly/Monthly Report	
Share appropriate and accurate content about the Trust in a timely way.	Weekly/Monthly Report	
Collect staff, patient and public feedback.	Weekly/Monthly Report	

### Performance Management of the Policy

Aspect of compliance or effectiveness being monitored using social media sites.	Monitoring method	Individual responsible for the monitoring	Frequency of the monitoring activity	Group / committee / individual responsible for ensuring that the actions are completed
Measuring output. The amount of updates each Trust account sends per month and the number of followers/likes/subscribers gained to measure social media exposure.	Report of social media accounts	Social Media/ Marketing Co-ordinator (Corporate accounts)  Any Trust social media Administrators (Trust accounts which they update)	Weekly/Monthly	Assistant Director of Communications

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Measuring outcome - the number of times social media update links are clicked, messages are retweeted (RT)/shared, updates are liked, comments are made. This will then be broke down by how many people created this activity.	Report of social media accounts	Social Media/ Marketing Co-ordinator (Corporate accounts)  Any Trust social media Administrators (Trust accounts which they update)	Monthly/Monthly	Assistant Director of Communications
Areas of staff non – compliance with policy	Investigations	Head of HR	Annually	Workforce Council

## 9. References

No	Reference
1	Doctors use of social media – GMC <a href="http://bit.ly/2iTjKFc">http://bit.ly/2iTjKFc</a>
2	HR and social media in the NHS –NHS Employers
3	A social media toolkit for the NHS- NHS Employers
4	Increasing staff engagement with social media – NHS Employers
5	Social media and attributed digital content policy – NHS England <a href="http://bit.ly/2AETaHD">http://bit.ly/2AETaHD</a>
6	Guidance on using social media responsibly – NMC- <a href="http://bit.ly/1SQI4EK">http://bit.ly/1SQI4EK</a>
7	Unite the Union – social media guide
8	Responsible social networking leaflet - Unison

## 10. Related Trust Documents

[List any procedural documents which are referenced within the text.]

No	Related Document
1	Raising Concerns Policy & Procedure
2	E-mail & Internet Policy
3	Staff Code of Confidentiality
4	Information Governance Policy
5	

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## 11. Equality Analysis Form

The screening assessment must be carried out on all policies, procedures, organisational changes, service changes, cost improvement programmes and transformation projects at the earliest stage in the planning process to ascertain whether a full equality analysis is required. This assessment must be attached to all procedural documents prior to their submission to the appropriate approving body. A separate copy of the assessment must be forwarded to the Head of Patient Inclusion and Experience for monitoring purposes via the following email, Cheryl.farmer@sthk.nhs.uk. If the assessment is related to workforce a copy should be sent to the workforce Head of Equality, Diversity and Inclusion darren.mooney@sthk.nhs.uk. If this screening assessment indicates that discrimination could potentially be introduced then seek advice from either the Head of Patient Inclusion and Experience or workforce Head of Equality, Diversity and Inclusion. A full equality analysis must be considered on any cost improvement schemes, organisational changes or service changes that could have an impact on patients or staff.

Equality Analysis			
<b>Title of Document/proposal /service/cost improvement plan etc:</b>		Media and Social Media Policy	
<b>Date of Assessment</b>	09/11/2021	<b>Name of Person completing assessment /job title:</b>	Lynsey Thomas
<b>Lead Executive Director</b>	Director of Human Resources		Senior Communications Officer
<b>Does the proposal, service or document affect one group more or less favourably than other group(s) on the basis of their:</b>		<b>Yes / No</b>	<b>Justification/evidence and data source</b>
1	Age	No	All staff groups have equal visual representation across the Trust. The Trust's social media group will be a safe space for all staff groups to access support and have visual representation regardless of protected characteristics.
2	Disability (including learning disability, physical, sensory or mental impairment)	No	As above
3	Gender reassignment	No	As above
4	Marriage or civil partnership	No	As above
5	Pregnancy or maternity	No	As above
6	Race	No	As above
7	Religion or belief	No	As above
8	Sex	No	As above
9	Sexual Orientation	No	As above
<b>Human Rights – are there any issues which might affect a person's human rights?</b>		<b>Yes / No</b>	<b>Justification/evidence and data source</b>
1	Right to life	No	The Trust is an inclusive environment, and this extends to its visual representation in both media and social media
2	Right to freedom from degrading or humiliating treatment	No	Safeguards are in place to protect characteristics of staff across the Trust via; reporting structure in the Communications Team. The Trust's social media group will be a safe space for all staff groups to access support and have visual representation regardless of protected characteristics. Freedom to Speak up Guardians are also available to raise any concerns
3	Right to privacy or family life	No	The social media groups is on a voluntary basis and is an additional tool to communicate and not exclusive
4	Any other of the human rights?	No	As above Part 2 and 3

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<b>Lead of Service Review &amp; Approval</b>	
<b>Service Manager completing review &amp; approval</b>	Kim Hughes
<b>Job Title:</b>	Assistant Director of Operations

## Data Protection Impact Assessment Screening Tool

If you answer **YES** or **UNSURE** to any of the questions below a full Data Protection Impact Assessment will need to be completed in line with Trust policy.

	Yes	No	Unsure	Comments - Document initial comments on the issue and the privacy impacts or clarification why it is not an issue
Is the information about individuals likely to raise privacy concerns or expectations e.g. health records, criminal records or other information people would consider particularly private?		x		
Will the procedural document lead to the collection of new information about individuals?		x		
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?		x		
Will the implementation of the procedural document require you to contact individuals in ways which they may find intrusive?		x		
Will the information about individuals be disclosed to organisations or people who have not previously had routine access to the information?		x		
Does the procedural document involve you using new technology which might be perceived as being intrusive? e.g. biometrics or facial recognition		x		
Will the procedural document result in you making decisions or taking action against individuals in ways which can have a significant impact on them?		x		
Will the implementation of the procedural document compel individuals to provide information about themselves?		x		

Sign off if no requirement to continue with Data Protection Impact Assessment:

Confirmation that the responses to the above questions are all NO and therefore there is no requirement to continue with the Data Protection Impact Assessment

Policy author Kim Hughes Date 25<sup>th</sup> August

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## Social Media Site Request Form

Name:
Job title:
email:
Contact number:
Approving Line Manager:
Name of site Administrator:
email of site Administrator:
Name of 2 <sup>nd</sup> Site Administrator:
email of 2 <sup>nd</sup> Site Administrator:
Please state which social media site you would like to use, e.g Twitter (x), Facebook.
Please give detailed reasons for using the site.
Who are you trying to target / who is your audience? e.g., Patients, the public colleagues?
Have you done your research? Are there any other sites which are doing what you intend to do and provide a similar service?
Please supply a choice of possible usernames, preferred email address of account set up (this will receive all the social media alerts and confirmations) and a password. The Communications Team will set up the site for you and keep a record of the below information. N.B The password must be unique and not used elsewhere.
Preferred username (For Twitter this is limited to 15 characters)
A new email address will be created for the account including the administrators and Line Manager in the mail distribution group.
Preferred password:
Authorisation signatures
Line manager:
Assistant Director of Communications/ Head of Media, PR and Communications:



## APPENDIX 2

# Trust presence social media content guidelines

If Trust employees (including those of the Lead Employer), casual staff and contractors are posting to social networking sites that is associated with the Trust, then the employee effectively becomes a voice of the Trust.

This content guide will help staff to understand what type of content can be posted on the Trust social media accounts.

The ACE Behavioural Standards which cover the below three areas should also be taken into account by the employee when representing the Trust through social media.

- The **Attitude** that we appear to show
- How we **Communicate** with patients, relatives and colleagues
- The **Experiences** we create

As a representative of the Trust, the employee is responsible for ensuring that their posts:

- Do not compromise their reputation, that of the Trust or cause a loss of confidence in its work.
- Do not encourage unlawful activity.
- Does not cause offence – examples of which includes but is not limited to offensive material relating to gender, race, sexual orientation, religious or political convictions or disability.
- Does not contain material which is libellous or pornographic includes incitement to commit a crime, hatred and violence or any activity that contravenes any of Trust’s policies including Equal Opportunities Policy.
- Are not inaccurate, harassing, threatening, personally insulting, fails to show dignity at work or may otherwise be illegal.
- Are respectful to other peoples’ views and show that staff are working as a team.
- Do not contain language likely to offend such as explicit words.
- Do not contain material that could be classed as abusive, bullying indecent, obscene, menacing; or in breach of confidence, copyright, privacy or any other rights.
- Do not encourage or describe activities which could endanger the safety or wellbeing of others.
- Are not posted anonymously or appear to impersonate someone else.
- Are not seen to support any political party, religious view or cause.
- Do not contain misleading, malicious or derogatory comments or references that would damage the reputation of, or misrepresent the Trust, or cause distress to its service users or any other employee.

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- Share identifiable information about patients.
- Do not disclose confidential or sensitive information about the Trust, and its partners or members of staff.

## Producing good online content

Content that gets peoples' attention is interesting information or a great story. This is the type of content people want to engage with and share. It is important to invite people to interact by sharing their thoughts, opinions and ideas.

Some sites allow people to be tagged for ease of identification. This should not be done as it may lead to the blurring of boundaries between personal use and professional and or the unintentional exposure of an individual's personal information to a wider audience.

When producing content for social media platforms on behalf of the Trust, the following guidelines should be followed:

- **Relevance:** content should be relevant to the services provided at the Trust or that of the wider healthcare community which the Trust has a direct association with.
- **Easy to read:** The content within updates needs to be quick and easy to read as web users tend to only spend a few seconds on any given article. Lengthy updates take more time and the audience's interest will be reduced.
- **Related links/images:** When posting information online other links and imagery which are relevant to the update may be acknowledged and included below the main body. Full written consent must be obtained from patients, carers or legal guardians. All images for social media must be taken by a Medical Photographer, a member of the Communications Team or with a Trust approved camera. These images must then be checked by the Communications Team prior to upload/distribution.
- **Stay on Topic:** posts should aim to be on topic; related to current news, events or research.
- **Be Positive:** Avoid negativity; contributions must not post negative comments about the Trust and stakeholders.
- **Be Honest:** the content needs to be honest – this will encourage others to respond and builds trust.
- **Respond to Criticism:** critical comments/complaints posted on social media should be replied to with a Trust approved line apologising with the appropriate department contact details given so the matter can be discussed and managed by the correct team. This PALS process can be viewed on the Complaints Process for Social Media.

If a media/press contact approaches the Trust via social media please refer to the Media/press process for social media sites.

It is important that content should not be published if there is any doubt that it is appropriate. Contact the Communications Team for confirmation of appropriateness to publish if required.

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## APPENDIX 3

# Corporate social media use public statement

The Trust’s corporate social media accounts are managed by the Communications team on behalf of colleagues across the organisation.

**Please note that we are unable to offer medical advice or diagnoses on social media. If you, a friend or family members are feeling unwell, please call either your GP surgery or NHS111 on 111 (free from mobiles and landlines).**

‘Social media’ covers various online and mobile technology tools which enable people to share information and resources.

The Trust uses the following social media platforms to communicate with patients, the public and the media:

- MWL Twitter username [www.twitter.com/mwlnhs](http://www.twitter.com/mwlnhs) (currently rebranding to X)
- MWL Facebook page [www.facebook.com/mwlnhs](http://www.facebook.com/mwlnhs)
- Whiston Maternity Facebook page [www.facebook.com/whistonmaternity](http://www.facebook.com/whistonmaternity)
- Ormskirk Maternity Facebook page [www.facebook.com/ormskirkmaternity](http://www.facebook.com/ormskirkmaternity)
- MWL Instagram – [www.instagram.com/merseywestlancsnhs/](http://www.instagram.com/merseywestlancsnhs/)
- MWL Threads - [www.threads.net/@merseywestlancsnhs](http://www.threads.net/@merseywestlancsnhs)
- MWL Recruitment Facebook page [www.facebook.com/mwlrecruitment](http://www.facebook.com/mwlrecruitment)
- St Helens and Knowsley YouTube channel [www.youtube.com/sthknhs1](http://www.youtube.com/sthknhs1)
- Southport and Ormskirk YouTube channel [www.youtube.com/southportandormskirkhospitalnhstrust](http://www.youtube.com/southportandormskirkhospitalnhstrust)
- MWL LinkedIn [www.linkedin.com/company/mersey-and-west-lancashire-teaching-hospitals-nhs-trust](http://www.linkedin.com/company/mersey-and-west-lancashire-teaching-hospitals-nhs-trust)

### **Availability**

The Trust’s social media accounts are constantly monitored predominantly during office hours: 09:00–17:00, Monday – Friday, excluding public holidays. Occasionally the Trust may cover events outside of these hours live on social media platforms relating to current news/incidents and events.

From time to time, social media services such as Twitter may be unavailable, and the Trust accepts no responsibility for lack of service due to social media service downtime.

### **Content**

We may use some scheduling tools to help us ensure content is spread across the week.

The Trust’s updates may increase due to important news or in the case of an emergency, for instance.

By sharing other social media users’ content, the Trust does not endorse the information or others’ views of that organisation or individual. The Trust aims to share information which adds to any debate or topic we are involved in.

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The Trust's social media content will cover some or all of the following:

- alerts about new content on digital channels, for example, news, publications, videos on YouTube, blog posts or health campaigns
- sharing content from organisations we follow, such as other NHS organisations, the emergency services and public sector organisations
- information on public health topics and campaigns
- occasional live coverage of events
- Trust staff achievement and awards

### **Following us on Twitter**

The Trust will not automatically follow a social media user back. This means you can easily identify other key Twitter users that the Trust thinks are relevant by seeing who we follow. However, being followed by the Trust does not imply endorsement of any kind. If the Trust needs to direct message you or you direct message the Trust, the Trust will follow a user's profile and may unfollow it afterwards. This may happen if the Trust asks for contact information via Direct Message.

### **Talking with us online**

The Trust welcomes feedback and ideas from all Followers. However, the Trust may not be able to reply individually to all the messages received via our social media profiles.

The Trust reads all comments to and about the Trust on social media platforms and ensure that any emerging themes or helpful suggestions are passed to relevant people in the organisation.

When the Trust replies to questions it may include us asking for an email address in order to give you a full response outside of the character limits on some social media services. This may be through Direct Message on Twitter or Private Message on Facebook.

The Trust cannot engage on issues of party politics.

Other ways of contacting the Trust are detailed in the 'Contact Us' section of our website:

<https://www.merseywestlancs.nhs.uk/contact-us>

### **Media enquiries**

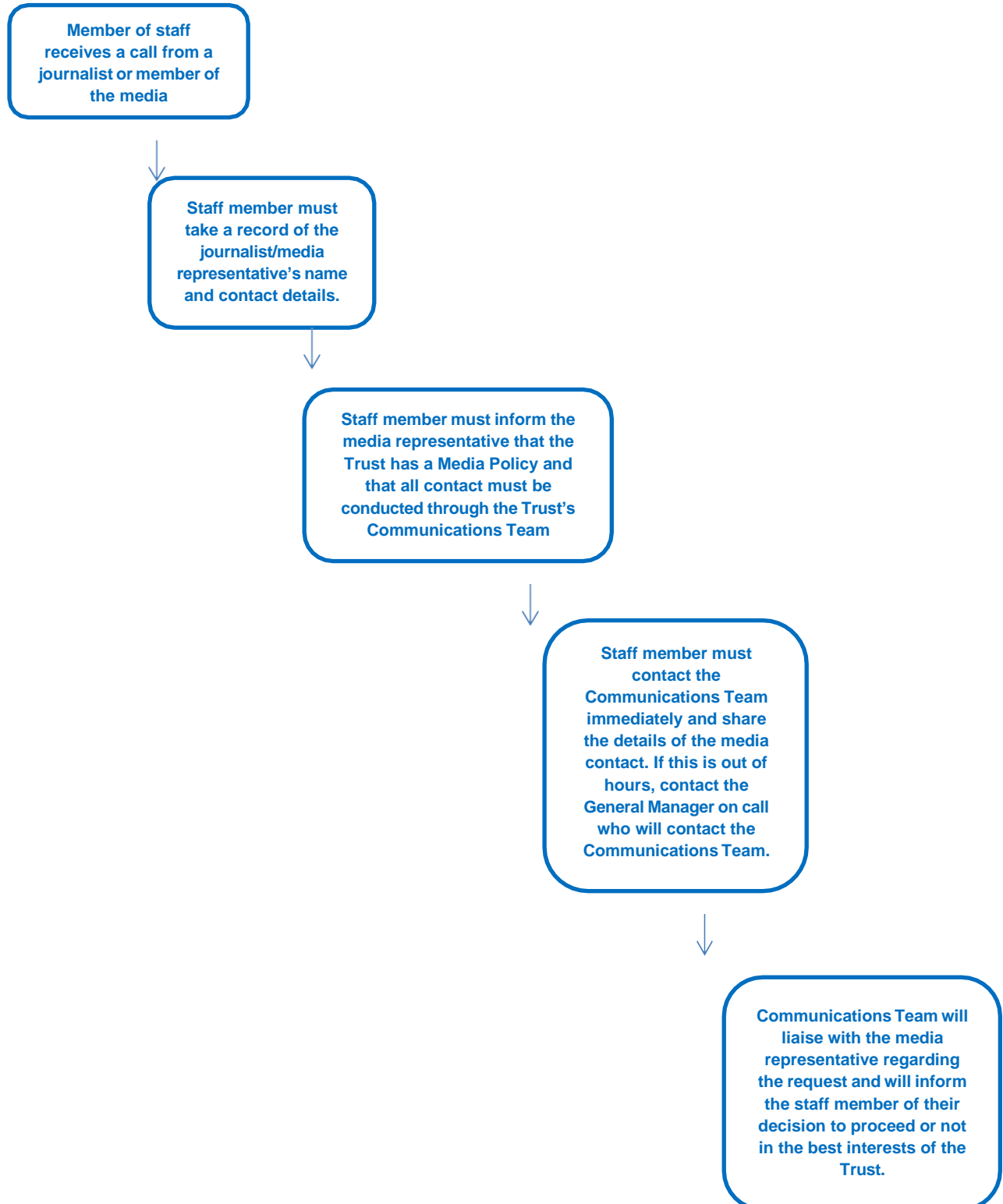
If you have a media enquiry and would like to contact the Communications Team, please call 0151 430 2505.

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## APPENDIX 4

### Media contact protocol

Should any member of staff be approached directly by a member of the media, journalist or media representative, then staff should follow the below protocol to inform the Communications Team. Under no circumstances should the staff member provide comment or agree to any form of media without first liaising with the Communications Team. Staff must not pre-plan their own media without the agreement of the Communications Team.





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**Appendix 5**

MWL Closed Staff Facebook Group

**DOs AND DON'Ts**



 <b>BE RESPECTFUL</b> Of others' opinions, roles and responsibilities. Don't single people out. <b>BE CURIOUS</b> Ask open questions that encourage discussion. <b>BE UNDERSTANDING</b> Of people's workload. Not everyone can respond to questions immediately. <b>BE CLEAR</b> Remember, people can interpret things differently. Can your post be taken the wrong way? <b>BE HELPFUL</b> Is someone unsure or do they need help? Give them a steer.	 <b>CONFIDENTIAL?</b> Don't post anything that could identify a patient or breach security. <b>APPROPRIATE?</b> Don't post inappropriate content, photographs, GIFs or videos. Ask permission before you post a colleague's photograph. <b>RIGHT FORUM?</b> Don't post complaints or grievances that require official escalation. <b>WHO'S INVOLVED?</b> All staff that work / volunteer at Mersey and West Lancashire Teaching Hospitals NHS Trust. <b>RIGHT AUDIENCE?</b> Don't share group posts on your own personal social media accounts. We want this to be a safe, private and friendly community.
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For further information, please call the Communications Team on 0151 290 4221 or email: [communications@sthk.nhs.uk](mailto:communications@sthk.nhs.uk)

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## **MWL Closed Staff Facebook Group - FAQs**

### **Why do we have a closed Facebook group?**

We wanted to create a vibrant, two-way engagement hub where content is shared for colleagues by colleagues.

We ask that you are polite, treat each other with respect and kindness.

We recommend reading our Facebook dos and don'ts, group rules and the Trust's social media policy before posting in the group.

If anything is posted that our moderators deem to be in breach of these rules, it will be removed without warning.

If you have any questions not answered in this document, please contact the Communications Team on **0151 290 4221**.

### **How do I join the closed staff Facebook group?**

You can find the page by searching 'MWL Staff Group'. Once on the page, click 'join'.

You will then be asked to answer three questions to verify you are a staff member.

A member of the Communications Team will approve your request (this may take up to a week).

You will then receive a notification to say your request has been successful and be able to see and post content.

### **Do I need a Facebook account to join the group?**

Yes, you will need a personal Facebook account to join the group.

### **Who will see my posts/comments?**

Only other members of the group will be able to see posts you make in the MWL staff group.

Your posts will not appear on the feeds of your friends, unless they are also members of the group.

Remember, although we tell members not to screenshot content, anything you say could still be copied and shared outside of the group. If you wouldn't say something in person, then please don't say it online.

### **Who will have access to my personal profile?**

It depends on your own individual privacy settings. We recommend all staff have their personal accounts set to private. This means if you join the closed staff Facebook group the only people who will be able to see your profile will be those you have added as a Facebook friend.

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## What should I post?

We don't want to set a prescribed list of what you can and can't post.

We ask that you:

- Are respectful of other's opinions, don't single people out
- Remember it's a professional forum. Don't post confidential or inappropriate content.
- Don't post complaints or grievances that require official escalation
- Are understanding of people's workload, not everyone can respond immediately
- Are clear about what you are 'saying' and remember people can interpret things differently, could your post be taken the wrong way?
- Don't invite non-staff / patients to join the MWL staff community.
- Don't share group posts on your own personal social media accounts, we want this to be a safe and friendly community
- Are helpful! Is someone unsure or do they need help? Give them a steer!

As a rule of thumb: If it's not appropriate to share openly at work, don't post it on social media.

## I've noticed something inappropriate – what should I do?

If you feel any content posted breaches the guidance set out in the Dos and Don'ts document, please inform a member of the Communications Team.

## What happens if I leave the Trust?

The Communications Team receive a monthly list of staff members that have left the Trust. When you are no longer an employee of the Trust, your membership of the private MWL Staff Closed Facebook Group will be removed.

## I'm fundraising for charity. Can I ask for donations?

Members are requested to only advertise fundraising if they undertake it for Whiston and St Helens Hospitals' Charity or Southport and Ormskirk Hospitals' Charity.

## I have a work query that needs responding to quickly. Should I post it in the Facebook group?

If you have an urgent query, please use the usual routes of escalation and speak to your line manager in the first instance.

## What action will be taken in the event of a breach of Trust policy?

Anyone breaching a Trust policy will be blocked from this group and reported to their line manager with the possibility of disciplinary action being taken against them.

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## APPENDIX 7

### **MWL Closed Facebook Group Rules**

#### **1 Requesting access**

This group is for current MWL staff only. If you request to join this group, please answer all questions otherwise your request will be declined. It may take up to a week for your request to be accepted.

#### **2 Posts relating to our staff community**

This group is for MWL staff. It is a great way to share your views, news and ideas. While things in our personal lives will undoubtedly be of interest to people in the group, let's keep posts professional, friendly, and positive.

Please note, spam and political campaigning are not permitted within the group.

#### **3: No hate speech or bullying**

Make sure that everyone feels safe. Inappropriate language, bullying and/or degrading comments about things such as race, religion, culture, sexual orientation, gender, or identity will not be tolerated.

#### **4. Protect patient/service user privacy**

Don't post anything that could identify a patient or breach security. Think about protecting anonymity when referring to situations at work. Patient related information/pictures of patients must not be shared under any circumstance.

#### **5: Be Kind and Courteous**

We're all in this together to create a welcoming environment. Let's treat everyone with respect. Healthy debates are natural, but kindness is required. We all need to feel safe to express our views and opinions, while it's ok to disagree with a comment, please only do so in a respectful way. It's not okay to use sarcasm, rubbish the views of others or use offensive language.

#### **6: Respect everyone's privacy**

Being part of this group requires mutual trust. Authentic, expressive discussions make groups great, but may also be sensitive and private. What's shared in the group should stay in the group. Members must not screenshot content to share elsewhere.

#### **7: Posts about fundraising/charity events**

Members are requested to only advertise fundraising for Whiston and St Helens Hospitals' Charity and Ormskirk Hospitals' Charity.

#### **8: HR issues and work-related grievances**

HR and work-related incidents should be raised appropriately with your line manager and not via this group.

#### **9: Trust Policies**

All Trust values, behavioural standards and policies must be adhered to at all times.

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