

Social Media Policy

Introduction

The Social Media Policy document provides guidance and direction to staff when utilising all types of online social media sites and networks.

Scope

This policy applies to all employees of **COMPANY** either participating personally, or communicating on behalf of the company, while online.

Implementation

Misuse or abuse of social and digital media can cause significant injury to third parties and can also impact negatively on the credibility of the company. This is particularly relevant in the context of safeguarding patient care and personal information. The company is potentially vicariously liable for injury caused by misuse or abuse of social and digital media channels by its employees. Consequently, the company takes any misuse or abuse of social and digital media by employees very seriously and can lead to significant disciplinary and legal actions.

Like all employee policies, it is the responsibility of local line management to address any issues that arise in relation to breach of these policies and regulations. There is also a significant personal responsibility placed on each employee.

- **Information Security Policy**
Each user is responsible for respecting and protecting the privacy and confidentiality of the information they process at all times
- **Electronic Communications Policy**
Confidential information regarding company business practices and procedures or personal information about any suppliers, clients or employees must not be posted or discussed on internet social networking websites, internet video hosting/sharing websites, internet discussion forums, message boards or internet chat rooms.

The company reserves the right to take such action as it deems appropriate against users who breach the conditions of these policies or Data Protection regulations. Employees who breach these policies may be denied access to the organisation's information technology resources, and may be subject to disciplinary action, including suspension and dismissal as provided for in the disciplinary procedure.

- **Code of Standards and Behaviour**

There is an implied term of mutual trust and confidence between employer and employee in all employment contracts. A very negative, defamatory or damaging posting or communication by an employee may entitle the employer to proceed with the Disciplinary Process, including investigation, and discipline up to dismissal if warranted. If defamatory material is posted on a social networking site, defamation claims may arise against the employee.

Employees must not improperly disclose, during or following termination of employment, information gained in the course of their work. Employees are expected to comply with the Code of Standards and Behaviour at all times. Breaches of the code will constitute a breach of the terms of employment and may result in disciplinary action being pursued in accordance with agreed procedures.

Representing the Company

The same rules that apply to our communications in traditional media, like newspapers, television and radio, also apply in online news or social media sites or networks.

- Official comment from the company to be broadcast online should be routed through appropriate Communications staff in the first instance.
- Any section / department that wishes to establish a social media profile or site should seek communications support via the appropriate manager, who will then be then responsible for the ongoing management and governance of authorised social media pages or profiles and consequently must be familiar with this policy document.
- The company will ensure that any official comments made online meet obligations under the Data Protection Act, especially in relation to private information.
- It will also be cognisant of any copyrights, trademarks, rights of publicity, and other third-party rights in the online social media space, including user generated content (UGC).
- Any requests from the media, public representatives or other organisations for official comment from the company on any topic should be referred to the manager.

Social Media Ownership:

All Social Media accounts created or used by employees on behalf of the company belong solely to the company. In addition, all log-in information, data, passwords and content related to (the company) accounts including all followers, subscribers and contacts will belong exclusively to (company). Employees are requested immediately upon the termination of their employment contract to cease accessing, using, updating or modifying any company related social media account. Even upon the termination of your employment with the company, (company) will continue to retain ownership and control of all (company) related social media profiles and all relevant data and information created or used during your employment. Employees are obliged to provide the company with all relevant information relating to social media profiles log-in information, including the usernames and passwords that they have created or modified.

Personal Social Media Profiles

Everyone is entitled to explore and engage in social media communities in a personal capacity, at a level at which they feel comfortable. As time passes, more and more people tend to link together in this way, and many social media sites will continue to allow you to register personal information like your hometown, education, likes, interests - and details of your employer.

If you choose to identify yourself as an employee on social media profiles, or in your commentary on personal topics within social media sites, it is important to use common sense and be aware of the nature of your comments and their possible consequences. It is important that all our employees are aware of the implications of engaging in forms of social media and online conversations that reference the company or your association with the company. Privacy, Data Protection requirements, defamation law and basic duty of care all still apply in comments that are made while off-duty and online. If an employee comments online in a personal capacity while identified as an employee, these comments can be attributed or perceived as the official position of the company.

Remember, when using social media in personal time:

- Be respectful of all individuals, races, religions and cultures; how you conduct yourself in the online social media space not only reflects on you – it is a direct reflection on your professionalism, your clients and your employer.
- Think before you post. Anything you post that is inaccurate, unfair, or breaking privacy standards will ultimately be your responsibility.
- You may come across negative posts about the company, but should avoid responding yourself. The post in question should be forwarded to the manager who is authorised to respond to comments on behalf of the company.
- Be conscious when mixing your business and personal lives. Online, your personal and business profiles are likely to intersect. The company respects the privacy of all employees, but you must remember that clients and colleagues may have access to the online content you post. Keep this in mind when publishing information online that can be seen by more than friends and family and know that information originally intended just for friends and family can be forwarded on very easily.
- Know that the Internet is permanent. Once information is published online, it is essentially part of a permanent record, even if you “remove/delete” it later or attempt to make it anonymous.

Protecting Employees from Online Abuse

Given the nature of and the high levels of participation in social media sites like Facebook in Ireland, employees may from time to time become the victim of abuse or defamation by members of the public through comments made and published on the internet or on social networks.

Where this occurs, local line management will work to support its employees in every way possible. Responsibility for responding to staff concerns about and coordinating the response to

abusive online comments rests with local line management, as is does with all staff health safety and welfare issues.

Where staff are notified of or are concerned about an abusive or defamatory post, profile, comment or page relating to an employee or service, this should be reported immediately to the senior line manager. The line manager should arrange for the post to be reviewed, and where possible or appropriate, the post should be reported as abuse with the relevant site's existing reporting process. A screenshot should be recorded of the comment.

The company senior management are available to assist line managers in responding to cases such as this, by providing access to sites such as Facebook to allow for online reporting, and by giving advice on how to approach website or network owners and publishers directly in relation to reporting abusive content.