



Social Media Questions & Answers

Following the update to the Social Media & Acceptable Use policy and FAQs, briefings were held earlier this year to share the key changes/updates. The following questions were raised and responses provided to address these questions are listed below.

You can also watch one of the briefings via this [Link](#).

1. Should a member of staff be absent through sickness and you became aware of behaviour through social media (say through a third party) that wouldn't be expected from someone on sickness absence (for example 'checking in' to a concert/trip away/sports event), does the policy cover this/how could this policy be applied?

This is covered under the [Attendance Policy FAQ 7.8](#).

In terms of “checking in” on Social Media Apps, employees who are absent from work due to sickness, the Attendance Frequently Asked Questions 7.8 specifically references that an employee can take holiday whilst on long term sickness.

In cases whereby employees are using social media to publicise their whereabouts/activities, whilst it is recognised that individuals can form judgements before considering the facts, we need to also acknowledge that absence is confidential between the manager and individual. If there are concerns of this nature the matter should be raised with your line manager in the first instance and for the manager to discuss with the absent employee who is “checking in” how this may be perceived by colleagues who maybe having to cover the work of the absent colleague and if this is acceptable given the reason for the absence.

However, sickness absence is confidential. Whilst we acknowledge that situations such as these can arise, judgements can be made without

understanding the full facts. There maybe an element of consideration that is required as it may be in the interests of the absent individual to undertake daily activities if it is not detrimental to their overall recovery, whilst also being mindful and sensitive of how this can come across to colleagues who are covering their work.

2. Personal and work life sometimes overlap on social media. Does the policy cover sharing of work events on personal accounts?

Using separate work and personal accounts if your social media account includes your connection to the organisation, it is advisable your account is not also used to post about your personal life. Separate work and personal accounts should be used in this instance.

Social Media Profile: Behaviour and conduct on social media whether that is from a work or a personal account where the connection/affiliation to the organisation is known, is detailed further in the [Social Media Policy FAQs](#).

It is being mindful about what you post and the connection with NHSBT and not bringing the organisation into disrepute.

3. What counts as a social media profile?

[Social Media FAQ's 1.2](#) - A social media profile is an account on a social media channel or platform that you control. This can be identifiable using your name and photo or be anonymous using a handle/username. Social media channels include public platforms such as Facebook, Instagram, X, YouTube, TikTok, Snapchat, LinkedIn and forums such as Threads. You should also apply this policy when using messaging tools such as WhatsApp and when creating websites and blogs.

Types of accounts:

Work-based Account: A work-based social media count must adhere to the Code of Conduct set out by NHSBT.

Personal Account: Your social media account including your name, handle, profile image and URL are your personal responsibility. Where an employee's connection to NHS Blood and Transplant is affiliated or apparent the centre you work in should not be included and a disclaimer is required on your profile/bio such as, "The views expressed on this [social media account, blog, website] are my own and do not reflect the views of my employer."

4. Are social media posts reviewed prior to being published?

Yes, all social media posts which are on NHSBT accounts go through the Social Media team to sense check and seek the relevant approvals and escalated, if needed, to get further approval.

5. Is WhatsApp a formal process which NHSBT uses to communicate?

[Social Media FAQ's 4.2](#) - Do I need to use messaging apps such as WhatsApp to receive updates from my team?

Managers across the organisation use messaging apps such as WhatsApp to communicate messages and updates to their teams. It can be a convenient tool for quick and efficient communication among team members. However, this will not be the only form of communication. NHSBT uses various methods of communication to deliver messages and important updates and decisions will still be issued by e-mail or in writing. Please ensure your manager is aware which method of communication you are able to access.

6. Compliance - Do work WhatsApp groups need to be registered for compliance purposes?

The Social Media team does not need to approve team or department WhatsApp groups set up for work or social purposes that only include employees. We would expect there to be permission and consent of everyone added to the group and for professional standards to be upheld.

Approval should be sought before setting up a broadcast lists or groups on WhatsApp on behalf of the organisation which are intended to share messages with the public.

In general, it is expected that you use NHSBT's corporate systems for NHSBT business. Any use of non-corporate communication channels (NCCCs) for significant NHSBT business engages your record-keeping responsibilities. Steps must be taken to safeguard and record centrally any decisions made via WhatsApp.

If decisions are made via instant message, it is the responsibility of those in possession of the information to ensure the information is extracted (either directly from the messaging app, or via screen shot, or follow up email) and saved as a record.

7. With personal Facebook accounts do I have to make a testimonial on that? What counts as a social media profile?

Please refer to Question 1.2 on the [Social Media FAQ's](#).

8. I would like to understand how the policy impacts volunteers who represent NHSBT and have listed that they are an Ambassador/Volunteer speaker for NHSBT in their personal social media handle, whether it be LinkedIn, Instagram, Facebook, X or Twitter.

We recognise the potential reputational risks of social media. The Social Media policy with supporting Frequently Asked Questions document seeks to give direction for appropriate use of social media on both a personal basis and when identifiable as an employee or contract/agency worker of NHSBT in a professional capacity. Therefore, if anyone represents NHSBT or is affiliated with the organisation they do not bring the organisation into disrepute.

9. Can “liking” a post on social media be a cause for concern for me?

Care should be taken when liking or sharing a post as it could be seen that you agree with or support the sentiment. We recognise that context is key but liking or sharing something abusive or defamatory could reflect negatively on the individual and bring the organisation into disrepute.

10. Where is the line in terms of freedom of opinion? Colleagues have fed back and stated that whilst there is no connection/affiliation to NHSBT as an organisation to their social media accounts, colleagues have highlighted that they have been spoken to by their line manager about the content of posts which they have put on social media.

We respect the right of all our colleagues to freedom of speech and opinion. The role of the policy is to guide and inform employees to avoid reputational damage to the organisation, not to stop valid debate and discussion.

We recognise some conversations will divide opinion but advise all employees be courteous and respectful when sharing their views.

It is important to be aware that even if you don't directly state your role in your bio etc, it may become apparent if you have multiple profiles, discuss your work online, use your full name or have colleagues as friends or followers.

Whilst we can't cover every scenario in the policy the social media team are here to offer advice and support to individuals and teams as needed.

11. FAQ regarding Government restrictions e.g the use of Tik Toc – clarify in the policy regarding Government restrictions.

The restrictions around the use of TikTok apply to downloading and using the App on work phones, this does not include personal devices owned by employees. The social media team does not currently use this platform for promotional activity in line with these restrictions but as with all channels ask colleagues to report anything concerning you see on the platform to us. We continue to monitor the situation.

More information can be found here:

<https://www.gov.uk/government/news/tiktok-banned-on-uk-government-devices-as-part-of-wider-app-review>

12. Are individuals informed that their e-mails/social media have been requested as part of a subject access request?

Emails and social media communications where an organisational address is used, e.g. an NHSBT email address, is information that NHSBT are the data controller and has ownership of the data. Each Subject Access Request (SAR) is treated on a case-by-case basis, and on some occasions, individuals might be advised out of courtesy that their communications have been requested.

13. Do Subject Access Requests apply only to work based related accounts or do they include personal accounts and can WhatsApp and Social Media posts be requested under a Subject Access Request?

Subject Access Requests (SARs) refer to an individual's right to request their personal data that is held by an organisation. In this event, a social media post or WhatsApp message in a work group chat can be disclosable as part of a SAR.

14. How far back does it go regarding a subject access?

Depending on the scope of the request, any information that the organisation holds can be requested and disclosed. If information outside of its retention period has been requested and has not been destroyed prior to the request, it remains disclosable under a Subject Access Request (SAR). Deletion of data that has been requested as part of a SAR to prevent disclosure is considered a criminal offence.

15. Will the slides and presentation be made available?

Yes, once all the briefings have taken place a copy of the slides and briefing will be made available for colleagues who could not attend one of the briefings. We also ask that managers raise awareness of the policy via team meetings and to encourage their teams to watch the briefings and read the [Social Media Policy and FAQ's](#).

Any additional questions can be raised via [HR Direct](#).

16. Will there be any future briefings for other policies

The Policy Team will consider this method for new or policies which have undergone a major review/changes.

17. Do I need to unlink my work e-mail account for personal use such as on line banking/personal Social Media does this apply on work mobile phones?

NHSBT email addresses must not be registered on non-NHSBT services unless as part of your professional duties at NHSBT, or part of your benefit package such as the Blue Light Card registration.

Staff must use personal e-mail and phone numbers to register personal social media accounts/banking.

Work email addresses and phone numbers must not be used for personal social media or online banking accounts. If used, these must be changed to personal email and phone accounts.

Use of all NHSBT devices, including work mobile phones, must be in line with [POL19 IT Acceptable Use Policy](#)

18. (a) What are the views on WhatsApp given the current media Interest in messages being deleted with regards to the COVID public inquiry?

Colleagues must exercise professional judgement appropriate to their circumstances, including regarding the codes of conduct and legal obligations which apply to them and the post they hold in NHSBT.

Any use of non-corporate communication channels (NCCCs), including WhatsApp, should be used with care and colleagues must be prepared to explain and defend their choices.

In general, it is expected that you use NHSBT's corporate systems for NHSBT business. Any use of NCCCs for significant NHSBT business engages your record-keeping responsibilities. Steps must be taken to safeguard and record centrally any important business information cascaded via WhatsApp; this is of particular importance if the information relates to NHSBT's response to Covid-19.

If significant business information is distributed via instant message, it is the responsibility of those in possession of the information to ensure the information is extracted (either directly from the messaging app, or via screen shot, or follow up email) and saved as a record. This extract must be saved a central document repository on NHSBT systems.

(b) Do we have a policy for managerial decision-making WhatsApp messages to be saved?

NHSBT's Records Management policy is under review and will be updated to include a policy approach on the use of non-corporate communication channels (NCCCs), including WhatsApp.

As above in 18(a), it is expected that you use NHSBT's corporate systems for NHSBT business. Any use of NCCCs for significant NHSBT business must be considered in your record-keeping responsibilities. Steps must be taken to safeguard and record centrally any important business information cascaded via WhatsApp.

(c) Do we still advocate that this medium (WhatsApp) is not to be the primary source of decision-making given evidence but should rather be used in conjunction with signed logs?

In general, it is expected that you use NHSBT's corporate systems for NHSBT business, including when documenting of decisions. Communication of NCCCs should be carefully considered before any use by NHSBT. At all times, steps must be taken to safeguard and record centrally any decisions made via WhatsApp or instant messaging.

(d) Do I need to use messaging apps such as WhatsApp to receive team updates? If using a personal mobile for work related What's App messages, will NHSBT provide a work mobile?

Managers across the organisation use messaging apps such as WhatsApp to communicate messages and updates to their teams. It can be a convenient tool for quick and efficient communication among team members. However, this will not be the only form of communication. NHSBT uses various methods of communication to deliver messages. Please ensure your manager is aware which method of communication you are able to access.

All individuals should be aware when joining WhatsApp groups with their personal phone that their personal phone number is visible to everyone in the group. We would recommend there is no obligation for someone to join a work WhatsApp group with a personal phone and issues or concerns should be discussed with managers.

For further information regarding the use of What's App or any non-corporate communication channels (NCCC's) please contact:

[Data Security, Privacy and Records Management \(prev Information Governance\)](mailto:InformationSecurity@nhsbt.nhs.uk) InformationSecurity@nhsbt.nhs.uk

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Employment Policy & Social Media Team