

SOCIAL MEDIA POLICY

Author:	Katie Chambers	Position:	Practice Manager
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Approved by:	K Chan		

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INTRODUCTION

1.1 Policy Statement

The purpose of this policy is to provide staff at this organisation with guidance and rules regarding the following:

- Understanding what to do when an unacceptable social media post has been placed by a patient about either the practice or its staff
- Understanding the policy relating to employees and alike (ARRS roles, trainees, students etc) regarding the use of social media.

This document has been produced to help all staff and patients to recognise the need to understand and uphold obligations as deemed appropriate and in accordance with the [NHS Constitution](#). While all persons have a freedom to express their opinion, staff have an obligation to ensure that concerns regarding unsafe practice, fraud or wrongdoings are managed as per the organisation's Freedom to Speak Up Policy and Procedure. Additionally, all staff have a fiduciary duty to their employer, and that loyalty is expected when placing any social media post.

Should there be any concerns regarding the level of care or treatment received, patients may only complain via the Complaints Procedure and in a manner that conforms to extant guidance in common with other NHS organisations. It should be noted that raising any grievance via social media does not conform to the legislation and as such will not be a complaint.

In addition to the above, this document is to be read in conjunction with the NHS E guidance titled [Social media](#). Throughout this document, there is also reference to other supporting policies that are held by the organisation.

1.2 Status

In accordance with the [Equality Act 2010](#), we have considered how provisions within this policy might impact on different groups and individuals. This document and any procedures contained within it are non-contractual, which means they may be modified or withdrawn at any time. They apply to all employees and contractors working for the organisation.

PRINCIPLES OF SOCIAL MEDIA POSTS

2.1 Patient access to information

This organisation wishes to ensure that patients have access to current and relevant information. Therefore, in addition to the website, the organisation posts information on social media platforms.

Staff are not permitted to use any of the organisation's social media platforms to make any unrelated posts. To prevent inappropriate usage of the platform(s), access will be limited to named persons, with any post having been approved prior to publishing. Furthermore, this organisation will also monitor social media platforms for comments and feedback

Any information posted is to be specific to the organisation. Under no circumstances is clinical information to be transmitted on any social media site, even if responding to a specific question that has already outlined any diagnosis or treatment.

Detailed guidance regarding the ethics and use of social media can be sought from the BMA guidance titled [Social media, ethics and professionalism](#).

2.2 Social media request by a patient

Should any patient send a 'friend' request over a social media platform then the below BMA advice should be considered.

Guidance can be sought within the GMC document titled Doctors' use of social media, and although this section is written with GPs in mind, all staff should be cautious when accepting a friend request from a patient and be mindful that professionalism and high standards are expected from all, regardless of whether they are at work or not. Patients who are not known to staff outside of work should not be added as friends. You must notify the practice manager if a friend is a registered patient at the practice in order to risk assess and mitigate a potential confidentiality breach.

2.3 Inappropriate postings by a patient

All staff are requested to remain vigilant while visiting any social media site especially regarding any detrimental comment being placed about this organisation or any of its staff.

The following medico-legal guidance is available to support inappropriate postings on social media. This includes actions that should be considered:

BMA	Dealing with abuse of practice staff on social media from patients
MDU	Dealing with online criticism
MPS	Top 5 social media dilemmas

To protect reputations, should there be an instance of inappropriate information upon a social media site, then a member of the management team is to be informed at the earliest opportunity.

The following links provide information on how some inappropriate posts can be deleted:

- [Facebook](#)
- [LinkedIn](#)
- [X \(Twitter\)](#)
- [Instagram](#)

Should it not be possible to remove a post, such as when the post has been added from a patient's social media account, then the organisation will contact the author of the post to request that the post or feed be removed.

Legislation to support this subject can be found within:

- [Protection from Harassment Act 1997](#)
- [Malicious Communication Act 1988](#)
- [Communications Act 2003](#)
- [Defamation Act 2013](#)

2.4 Should a patient be unwilling to remove a post

Should the patient not be willing to remove an inappropriate or factually incorrect post, then the Partners and the Practice Manager will consider the options. This may include contacting the defence union both for advice and to confirm the process to be followed. Note, the organisation could bring a claim on the basis that the publication amounts to both a misuse of its private information and a breach of Article 5 of the UK General Data Protection Regulations (UK GDPR) and as detailed within the UK General Data Protection Regulation (UK GDPR) Policy.

If the person is not prepared to remove the post, and should this be unfounded, malicious or unreasonable against the organisation or any staff member, then they should be advised that, while the organisation welcomes feedback, comments such as this are not considered to be constructive. The patient should also note that this also explicitly compromises their requirements as detailed within the NHS Constitution within the [Patients and the public: your responsibilities](#) section.

Should the above actions have been taken but the patient(s) continues to be unwilling to remove any unfounded, malicious or unreasonable social media post against the organisation or its staff, it could be suggested that the patient-doctor relationship has broken down in accordance with the GMC's guidance for [Good medical practice](#). In addition to this, additional guidance to manage the removal of a patient can be found within the MDU document titled [Removing patients from a GP practice list](#).

Furthermore, these organisation policies detail this subject:

- Dealing with Unreasonable, Violent and Abusive Patients Policy
- Removal of Patients Policy

It should be noted that, justifiably, patients should not be removed due to a complaint. Should the post be a complaint in nature, or should it refer to an ongoing complaint, the Complaints Lead will contact the patient to give them the opportunity to follow the correct complaint pathway within the Complaints Procedure. A complaint leaflet outlining the process will also be offered.

At this stage, it should be agreed that the patient removes the offending post as failing to do so is detrimental to the patient/doctor relationship as detailed above.

All staff have a responsibility to be aware of the expectations placed upon the organisation's patients and that unacceptable behaviour will not be tolerated and will be managed accordingly.

PATIENT RECORDINGS WITHIN THE PRACTICE

3.1 Patients requesting to record their consultation

The BMA advises that patients are increasingly asking doctors if they can record or video consultations on their phones or other devices. The BMA document titled [Patients recording consultations](#) provides detailed guidance on patients recording consultations.

While it is acceptable for a patient to overtly record the consultation if permission has been sought, should this not have been sought, then the BMA guidance above can be followed. Should a patient request to make a recording, then the following is to be agreed to enable the recording:

- All recordings are requested and carried out in an open and honest manner and do not interfere with the consultation or treatment
- At the end of the consultation, the clinician might suggest that the patient provides a copy of the recording to be added to their healthcare record and form a permanent record of the consultation
- An entry will be made within the patient's health record with the [SNOMED CT](#) code: Audio recording of subject interview 431315003 being used. The entry should state that the patient has recorded the consultation or the care being provided
- The patient should be reminded of the private and confidential nature of the recording and that it is their responsibility to keep it safe and secure
- The recording is only made for personal use. Patients are to be made aware that the misuse of a recording may result in criminal or civil proceedings

3.2 Covert patient recordings

A patient wishing to covertly record a consultation or conversation with any healthcare professional raises concerns as to the reason or intentions for doing so. Should it become apparent that a covert recording is occurring, then the patient will be discouraged from doing so by the following actions being taken:

- An open and honest recording of consultations will be promoted when a patient deems this to be necessary
- To avoid a patient feeling the necessity to record any consultation, the organisation will highlight the fact that proactive steps are always taken to investigate and address any issues regarding any patient's treatment and care
- Clinical staff should consider providing patients with a written summary of their consultation for their own personal use
- Patients are advised that they are entitled to see their medical record and, if they wish to do so, they should request this through a Subject Access Request (SAR) made under the [Data Protection Act 2018](#) in accordance with the organisation's Access to Medical Records Policy
- Patients are given information about how they can complain if they have an issue with their treatment and care. The complaints leaflet can be found within the Complaints Procedure

Further advice can be sought from:

- MDU: [Patients recording consultations](#)
- Pulse: [Can I stop a patient recording our consultation?](#)
- BMJ: [My patient wants to record our conversation, what should I do?](#)

3.3 Patients posting their consultation recording online

Should any consultation be posted online, then the BMA guidance in the document titled [Patients recording consultations](#) should be followed. Removal will be requested by the practice manager in writing. If a consultation is posted without the prior permission of the surgery the patient will be issued a formal written warning. Continued repeated action will result in removal of the patient from the list under break down of relationship.

3.4 Use of audio-visual recording within public areas of the practice

Patients should not photograph, video or use sound recording that captures any other patient that could identify that they have been at the practice as this affects their right to confidentiality as detailed within the organisation's Caldicott and Confidentiality Policy

It should be noted that all patients have privacy rights, and no recording of other patients can be made without their explicit consent. Likewise, no member of the public can photograph or make either a video or audio recording of any member of staff without the express permission of that person.

Any such recording is likely to be an interference with their privacy rights under [Article 8](#) of the European Convention on Human Rights and this may constitute a criminal offence or a data breach depending on the context of the disclosure

3.5 Patient social media guidance

This practice has a duty to maintain patient confidentiality and to safeguard vulnerable patients. You can help us to achieve this by adhering to the code of conduct outlined in this guidance.

Patients are expected to always adhere to the following code of conduct:

1. The organisation requires all users of portable devices to use them in a courteous and considerate manner, respecting their fellow patients. Portable devices are not to be used during consultations, except when agreed with your clinician.
2. Patients are not permitted to disclose any patient-identifiable information about other patients unless they have the express consent of that patient.
3. While not encouraged, patients may record their consultation, but this should be agreed with your clinician. This recording will solely be for your own purpose.
4. Patients must not post any material that is inaccurate, fraudulent, harassing, embarrassing, obscene, defamatory or unlawful. Any such posts on any of the practice's social media pages will be deleted and the post reported.
5. Patients are not permitted to take photographs in any area where other patients are present, nor is it permitted to take photographs of staff.
6. Patients must not post comments on social media that identify any staff.
7. Patients can leave an official review about the practice on google or use the feedback form on our website. They can also complete the friends and family review after their appointment. This will enable the practice to respond appropriately. Reviews left on unofficial sites will not be responded to.

8. Defamatory comments about our team are not to be shared on any social media platform. Legal advice may be sought and the appropriate action taken against any patient who posts defamatory comments.

Patient complaints on social media

We have a separate Complaints Procedure that patients are to use should they wish to make a complaint. We will only respond to complaints made to the organisation in accordance with practice policy.

If a complaint is made on a social media platform, it will not be acknowledged, and you will be requested to delete it.

STAFF AND THE USE OF SOCIAL MEDIA

4.1 Scope of this policy

This policy is in place to minimise the risks to the Practice through use of social media. This applies to the use of all forms of social media, including but not limited to Facebook, LinkedIn, X, WhatsApp, TikTok, Snapchat, Wikipedia, Whisper, Instagram, Tumblr and all other social networking sites, internet postings and blogs. It applies to use of social media for business purposes as well as personal use that may affect our business in any way whether during office hours or otherwise.

The policy applies regardless of whether the social media is accessed using our IT facilities and equipment or equipment belonging to members of staff.

This policy applies to all employees, officers, consultants, contractors, volunteers, interns, casual and agency workers. Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy. This policy does not form part of your contract of employment or contract to provide services, and we may amend it at any time.

4.2 Responsible persons

The Practice Manager holds overall responsibility for the implementation, monitoring, and effective operation of this policy.

All staff are responsible for ensuring that they act in accordance with the requirements set out in this policy and maintain the standards of conduct expected of them at all times.

All staff also have a duty to report any concerns, incidents, or breaches of this policy to the Practice Manager as soon as reasonably practicable, in line with the practice's governance and reporting procedures.

4.3 Compliance with related policies and agreements

Staff must ensure that their use of social media does not breach any of the practice's other policies, contractual obligations, or professional standards. Any content published online that would be considered a breach of practice policy in another setting will also be regarded as a breach if posted on social media or other online platforms.

In particular, staff must not use social media to:

- Breach the Practice's information governance policy
- Breach any obligations relating to the rules or standards set by relevant professional or regulatory bodies.
- Breach the Practice's policies or obligations relating to confidentiality.
- Breach the Practice's Disciplinary Rules and Procedures.
- Harass, bully, or intimidate colleagues, patients, or other individuals.
- Unlawfully discriminate against colleagues, patients, or third parties.
- Breach the Practice's Data Protection Policy, including the disclosure of personal or identifiable information about colleagues, patients, or other individuals.
- Breach any applicable laws, regulatory requirements, or professional ethical standards.

Staff should exercise care and professional judgement when using social media, whether for personal or professional purposes. Online activity can have an impact on the reputation of the Practice, colleagues, patients, and the wider NHS, and staff are expected to behave responsibly at all times.

When using social media, staff should:

- Ensure that their conduct online is consistent with the standards of professionalism expected within the workplace.
- Always respect patient confidentiality and never disclose any patient-identifiable information.
- Do not post any content that could damage the reputation of the Practice, its staff, patients, or partner organisations.
- Do not post content that is recorded/filmed within the surgery or in uniform as content could be seen by others to be endorsed by the practice
- Profile pictures should not be taken at work or in uniform
- Ensure that any opinions expressed are clearly their own and do not represent the views of the Practice unless authorised to do so.
- Consider carefully the content they share, recognising that information posted online may be public, permanent, and widely accessible.
- Maintain appropriate professional boundaries with patients and service users when using social media platforms.
- Use privacy settings where appropriate, while recognising that these do not guarantee that content will remain private.
- If you are concerned or uncertain about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with the Practice Manager.

Staff should be aware that inappropriate use of social media may result in disciplinary action in accordance with the Practice's Disciplinary Policy.

4.4 Personal Use of Social Media

Personal use of social media must not take place during working hours or through the use of the Practice's computers, networks, IT resources, or communication systems, in accordance with the Practice's IT and communications policies.

Staff must not take photographs, record videos, or create social media content while at work for personal use. This includes, but is not limited to, content created for social media platforms such as video-sharing applications or similar services. The Practice premises, equipment, workspaces, uniforms, colleagues, patients, or any identifiable features of the workplace must not be used as a background or included in photographs, videos, or other digital content intended for personal social media use.

Any photography, video recording, or creation of digital content within the workplace, or content that features the workplace in any way, is strictly prohibited unless prior written consent has been obtained from the Practice Manager. This requirement applies to all forms of media, including photographs, videos, and short-form content created for social media platforms.

Failure to comply with this section may result in disciplinary action in accordance with the Practice's Disciplinary Policy.

4.5 Prohibited use

Staff must not use social media in any way that could damage the reputation, interests, or operations of the Practice, its staff, patients, stakeholders, or business partners. This applies both directly and indirectly.

The following actions are strictly prohibited:

- Circulating chain letters, spam, or any other unsolicited communications.
- Defaming, disparaging, or making negative statements about the Practice, colleagues, patients, stakeholders, business partners, or any third party.
- Harassing, bullying, or unlawfully discriminating against staff, patients, or third parties.
- Making false, misleading, or deceptive statements, or impersonating colleagues, patients, or other individuals.
- Expressing opinions or making statements on behalf of the Practice without prior written authorisation from the Practice Manager. Staff may be required to complete training to obtain such authorisation.
- Posting comments about sensitive business-related matters, including practice performance, financial information, or other confidential information.
- Compromising patient confidentiality, confidential business information, or intellectual property.
- Using the Practice's logos, trademarks, or branding in social media posts or profiles without explicit written permission.

- Responding to media or social media enquiries about the Practice unless you have been given permission by a partner or the practice manager to do so in writing.

You may be required to remove any social media content that we consider constitute a breach of this policy. Failure to comply with such a request may result in disciplinary action.

Any misuse of social media, suspected breaches of this policy, or concerns regarding content must be reported immediately to the Practice Manager. Failure to comply with this section may result in disciplinary action in accordance with the Practice's Disciplinary Policy.

4.6 Business use of social media

Where staff duties require them to engage in social media on behalf of the Practice, such use must be authorised in advance a Partner or the Practice Manager. Approval may be subject to mandatory training, and we may impose specific requirements, restrictions, or monitoring arrangements regarding the content, timing, and nature of social media activities.

Staff authorised to use social media for business purposes must:

- Ensure that all communications are professional, accurate, and reflect the values, policies, and standards of the Practice.
- Obtain prior approval for any content that could be considered sensitive, confidential, or potentially damaging to the Practice's reputation.
- Clearly identify themselves as representatives of the Practice and avoid posting anonymously or under pseudonyms.
- Maintain professional boundaries at all times, including avoiding interactions with patients or service users that could compromise confidentiality or professional integrity.
- Ensure that any multimedia content, such as images or videos, complies with the Practice's policies on confidentiality, patient consent, and copyright.
- Refrain from using personal accounts to conduct official Practice business unless explicitly authorised and approved by the Practice Manager.
- Immediately report any errors, complaints, or incidents arising from social media activity to the Practice Manager.

Failure to comply with these requirements may result in withdrawal of social media authorisation, disciplinary action, or other corrective measures, in accordance with the Practice's policies.

4.7 Monitoring

All contents, messages, files, data, documents, facsimiles, telephone conversations, social media posts, or any other communications transmitted, received, stored, or recorded using the Practice's IT resources and communications systems remain the

property of the Practice. Staff should therefore have no expectation of privacy in any such communications or materials.

The Practice reserves the right to monitor, intercept, and review, any use of its IT resources and communications systems, including social media activity, for legitimate business purposes. Such purposes include, but are not limited to:

- Ensuring that staff use IT resources in accordance with expected professional and organisational standards.
- Detecting, investigating, and preventing unauthorised or inappropriate use of IT systems, including activities that may constitute misconduct or criminal offences.

Staff are expected to use IT resources responsibly and in line with all relevant Practice policies, including those relating to social media, confidentiality, data protection, and professional conduct.