

South Infirmary-Victoria University Hospital





Title: SIVUH Social Media Policy for Patients and Visitors

Document Reference Number	GEN0029ORG	Document Developed by	Trudy Caffrey, Data Protection Officer
Revision Number	0	Document Approved by Date	Clinical Governance (Quality and Safety) Committee 10th December 2018
Implementation Date	December 2018	Responsibility for Implementation	Trudy Caffrey, Data Protection Officer
Next Revision Date	December 2021	Responsibility for Review and Audit	Trudy Caffrey, Data Protection Officer

Reviewers:

Kieran Murphy, Quality & Risk Manager
Kara Ryan, SEO Quality & Risk Department
Helen Donovan, Chief Executive Officer
Ruth Lernihan, Director of Nursing
Brenda O'Brien, Nursing Practice Development Coordinator
Eamonn O'Connell, Clinical Director
Valerie Cronin, Patient Complaints Coordinator
Ronan O'Connell, MSDIT Manager
Colm Murray, Portering Services Manager
Anita Regan, HR Manager
Juliette Wells, Staff Officer MSDIT


 10/12/18

 10/12/18

Title: Social Media Policy for Patients and Visitors	
Document Reference No: GEN0029ORG	Revision No. 0
Implementation Date: 10 th December 2018	Page: 1 of 8

South Infirmary-Victoria University Hospital

Table of Contents

1.0	Policy Statement	3
2.0	Purpose	3
3.0	Scope	4
4.0	Legislation/Related Policies	4
5.0	Glossary of Terms and Definitions	4
6.0	Roles and Responsibilities	5
7.0	Procedure..	6
8.0	Implementation Plan	6
9.0	Revision and Audit	8
10.0	References/Bibliography	8

Title: SIVUH Social Media Policy for Patients and Visitors		
Document Reference No:	GEN0029ORG	Revision No. 0
Implementation Date:	10 th December 2018	Page: 2 of 8

South Infirmary-Victoria University Hospital

1.0 Policy Statement

The use of the internet and social media has become an integral part of everyday life. The SIVUH must embrace this for its opportunities, but also carefully manage its use to ensure appropriate protection for all users.

Used well, the internet and social media can improve the way we share information, can empower patients and staff and can improve the openness and transparency of healthcare organisations. We have an obligation to ensure those using the internet and social media at SIVUH, or in relation to SIVUH activity, are absolutely clear about our expectations regarding professional behavior, protecting patient confidentiality and safeguarding information.

This policy sets out our expectations for internet and social media use for SIVUH patients and those visiting the SIVUH. It outlines the ways in which the Hospital can ensure acceptable use of the internet and social media by patients and visitors. The policy also applies to contractors/ sub contractors / sales persons / technicians working in the Hospital.

Social media is rapidly evolving and expanding so this policy will focus mainly on the most popular and commonplace social media platforms currently available:

- Microblogging e.g. Twitter
- Blogging e.g. WordPress and Tumblr
- Social sharing e.g. Facebook and MySpace
- Video sharing e.g. YouTube, Vimeo and Vine (byTwitter) Picture sharing e.g. Flickr, Instagram, Snapchat and Pinterest Professional sharing e.g. LinkedIn
- Social bookmarking e.g. Reddit, StumbleUpon and Delicious

New social media channels and platforms will emerge but the underlying principles and expectations of this policy will be the same.

2.0 Purpose

This policy is not intended to account for every situation that may arise; it aims to outline a number of important principles which reflect the ethos of the SIVUH; we are committed to providing the highest quality service to all our patients in a friendly, safe and caring environment.

All staff must read and understand this policy to be clear about the general standards of conduct required of patients and visitors when using the internet or social media while at

Title: SIVUH Social Media Policy for Patients and Visitors		
Document Reference No:	GEN0029ORG	Revision No. 0
Implementation Date:	10 th December 2018	Page: 3 of 8

South Infirmary-Victoria University Hospital

the Hospital or related to SIVUH activities. If any staff member has any doubt about the meaning of the examples listed, they should speak to their line manager for clarification.

The SIVUH will provide communication materials both internally and externally to make staff, patients and visitors aware of this policy and its guidelines.

3.0 Scope

This policy applies to patients, carers, relatives and all those visiting SIVUH premises whether in a personal or professional capacity. Its expectations and guidance include any use of SIVUH devices or personal devices to access the internet or social media, whether through the SIVUH WIFI network or through alternative internet access arrangements.

4.0 Legislation/Related Policies

SIVUH HR0042ORG Social Media Policy
SIVUH IT0001ORG Acceptable Computer Usage Policy
SIVUH HR0032ORG Dignity at Work Policy
SIVUH HR0007ORG Equality & Diversity Policy
SIVUH RISK0008ORG Complaint Policy and Procedure
General Data Protection Regulations 2018
Data Protection Act 2018

5.0 Glossary of Terms and Definitions

5.1. Social media is the generic term given to any form of internet-based platform which enables online interaction and communication between users. Social media can include text, audio, video, images, podcasts, and other multimedia communications.

5.2. Social networking is the use of social media sites, allowing individuals on-line interactions that mimic some of the interactions between people with similar interests that occur in life.

5.3. Microblogging is the practice of posting short messages or digital content (essentially this is blogging with a very limited word count). Twitter is an example of a microblogging site which limits messages (or "tweets") to a certain number of characters in length.

5.4. Blogging is the use of a public website to write an on-line diary (known as a blog) sharing thoughts and opinions on various subjects.

5.5. Social sharing is a form of social networking, where websites allow registered users to create personal profiles, upload photos and videos, send messages and keep in touch.

5.6. Video / picture sharing allows anyone to upload short videos or pictures to a website/other social media, either for restricted viewing (to a limited list of friends or viewers) or as a showcase to the wider public.

Title: SIVUH Social Media Policy for Patients and Visitors		
Document Reference No:	GEN0029ORG	Revision No. 0
Implementation Date:	10 th December 2018	Page: 4 of 8

South Infirmary-Victoria University Hospital

5.7. Professional sharing is a form of social networking website which is geared towards companies and industry professionals looking to make new business contacts or keep in touch with previous co-workers, affiliates and clients.

6.0 Roles and Responsibilities

6.1. Managers

All SIVUH managers are responsible for ensuring that staff know how to access current SIVUH policies. All managers must understand the policy and how to escalate concerns that cannot be locally resolved.

6.2. Staff

All staff have a responsibility to report inappropriate use as outlined in this policy to their line manager in the first instance or to another member of staff.

6.3. Patients and SIVUH visitors

All patients and SIVUH visitors are required to adhere to this policy. It is the responsibility of the SIVUH to ensure the policy is publicised and available for all patients and visitors.

6.4 SIVUH Social Media accounts

All social media accounts associated with SIVUH business and activities are expected to adhere to the principles and expectations of this policy. The SIVUH will take all steps available to close down any linked social media account found to be acting outside of this policy.

6.5 Data Protection Officer

The Data Protection Officer is responsible for reporting a breach of this policy to external agencies as required, including and not limited to An Garda Síochana, SIVUH solicitors and third party social media sites e.g. Facebook, Twitter, Snapchat, Instagram.

6.6. Contractors/ Sub-contractors / Sales persons and technicians

All persons conducting business at the SIVUH must adhere to this policy. If through the provision of services or maintenance of equipment, recordings or photographs are required, these are only permitted when authorised by a staff member and when they adhere to this policy.

Title: SIVUH Social Media Policy for Patients and Visitors

Document Reference No: GEN0029ORG

Revision No. 0

Implementation Date: 10th December 2018

Page: 5 of 8

7.0 Procedure

7.1 Patient/Visitor use of internet and social media

The SIVUH requires all users of mobile devices to use them in a courteous, considerate and non-intrusive manner to help maintain a caring environment and effective working environment for staff. Patients and visitors may be able to access social media and internet sites via their mobile phone networks whilst at SIVUH, which are not subject to the same security protocols. Visitors to SIVUH may be able to access guest wifi where installed. Minimal business web content control has been applied.

Patients may take photos of themselves and/or their relatives for personal reasons, and for their own personal use only. Patients and visitors must ensure that other patients, and/or staff or any information pertaining to other patients/staff are not visible in any part of such photography, to ensure confidentiality and to protect privacy and dignity.

Express permission is needed for photographs to be taken of the inside of hospital premises, particularly wards and clinical areas (including SIVUH staff) or outside on Hospital grounds. This should be obtained from the ward manager or other relevant manager. Taking photographs/videos on our site of other patients, staff or visitors without their informed consent is not permitted.

Patients are not permitted to use video recording devices during clinical consultations.

If patients wish to audio record any clinical consultation with SIVUH staff, this must be discussed with the treating clinician, allied health professional or other prior to the consultation and outlining the purpose and intent of the recording.

We understand that our patients will want to stay in touch with their friends and family while in our care. We also have a duty to protect patient confidentiality and a responsibility to safeguard vulnerable patients in our care. The following guidelines apply to all our patients/visitors:

1. You may inadvertently overhear conversations about other patients while in our wards or departments. Please respect the confidential nature of these conversations by not sharing details about others in our care without their prior consent. If we obtain evidence of internet or social media activity that shares such confidential information, we

Title: SIVUH Social Media Policy for Patients and Visitors		
Document Reference No:	GEN0029ORG	Revision No. 0
Implementation Date:	10 th December 2018	Page: 6 of 8

South Infirmary-Victoria University Hospital

will ask you to remove that content, where necessary we will contact the third party social media site and request the removal of the content and report the user, we may also escalate the matter externally and seek legal advice or contact An Garda Síochana.

2. Defamatory comments about members of our staff must not be shared in any public forum. For any defamatory comment/s shared in a public forum, legal advice will be sought and action taken as necessary.

Everything you post online, including photographs, is public: even with the strictest privacy settings. Once something is online, it can be copied and redistributed, and it is easy to lose control of it. Presume that everything you post online will be permanent and will be shared.

7.2 Breach of Policy

On receipt of notice or where the SIVUH becomes aware of any suspected breach of this policy, the Hospital reserves the right;

- to remove, or require the removal by the user of any content which is deemed to be in breach or potentially in breach of this Policy
 - to disable any user and access to hospital IT resources
 - to issue take down notices to third party social media sites
 - to report the user to the third party social media site for inappropriate content.
 - to escalate the issue externally, seeking legal advice or contacting An Garda Síochana as appropriate.
-
- Where a patient suspects inappropriate use of social media or internet content by patients or visitors, they should inform a staff member.
 - Staff who become aware of inappropriate use of the internet or social media by patients or visitors on SIVUH sites must report it to their line manager.
 - Line managers who are made aware of a breach of the policy should where possible resolve the matter informally and locally, requesting the user to remove any content deemed inappropriate.
 - Where the matter cannot be resolved easily, the Line Manager will report the breach of policy to the Department Head or the Data Protection Officer (DPO).
 - Where required the DPO will issue take down notices to third party sites.
 - In the case of serious or frequent violations of this policy the issue will be escalated externally and legal advice will be sought and/or An Garda Síochana contacted.

Title: SIVUH Social Media Policy for Patients and Visitors

Document Reference No: GEN0029ORG

Revision No. 0

Implementation Date: 10th December 2018

Page: 7 of 8

South Infirmary-Victoria University Hospital

7.3 Patient Complaints and Comments

If you are dissatisfied with a service, please make this known immediately to the relevant hospital staff member, the staff member will endeavor to address your concerns at local level. In the event that you are not satisfied with the outcome of your raised concern and you wish to make a formal complaint, you can forward same for the attention of the Complaints Coordinator. Your complaint will be addressed in accordance with Part 9 of the Health Act 2004 (complaints handling) you can contact the Complaints Coordinator:

- By telephone to 021-4926100
- By email to patient.complaints@sivuh.ie
- In letter format
- SIVUH Website - Feedback Form

8.0 Implementation Plan

The policy will be made available to visitors, patients and the public on the SIVUH's website and the link to the policy will be publicised at various locations throughout the Hospital.

9.0 Revision and Audit

This policy will be reviewed every 3 years and as required.

10.0 References/Bibliography

Data Protection Act 2018
General Data Protection Regulations (GDPR) 2018
SIVUH HR0042ORG Social Media Policy
SIVUH IT0001ORG Acceptable Computer Usage Policy
SIVUH HR0032ORG Dignity at Work Policy
SIVUH HR0007ORG Equality & Diversity Policy
SIVUH RISK0008ORG Complaint Policy and Procedure

Title: SIVUH Social Media Policy for Patients and Visitors		
Document Reference No:	GEN0029ORG	Revision No. 0
Implementation Date:	10 th December 2018	Page: 8 of 8