Section A: Assessment

Name of Policy All Wales Social Media Policy

Person/persons conducting this assessment with Contact Details Marie Mantle, Head of Information Governance

marie.mantle@nhs.wales.uk

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1. The Policy

Is this a new or existing policy?

This policy has been developed as an All Wales policy. It replaces the UHB's locally developed guidelines that were implemented in October 2013.

What is the purpose of the policy?

The provision of safe effective health care, whilst ensuring that individuals are treated with dignity and that their right to privacy is respected, is central to the development and delivery of quality services within Cardiff and Vale University Health Board (the UHB). While it is accepted that social media and mobile telecommunications technologies is a core component of modern social behaviour and communication, inappropriate use poses a risk to the organisation and its patients and staff.

The UHB acknowledges that many employees use social media for personal and professional purposes. Generally, this is uncomplicated and trouble-free, but increasingly social media has blurred the lines between and can have repercussions in

people's personal and professional lives.

The purpose of this policy is to set out the expectation that all staff behave appropriately and in a way which is consistent with the UHB values and professional codes of conduct when using social media, and especially:

- If a member of staff identifies an association with the UHB
- Discusses their work, colleagues or patients
- Comes into contact, or is likely to, with service users on social media sites.

How do the aims of the policy fit in with corporate priorities? i.e. Corporate Plan

This policy supports the following UHB Policies:

- Information Governance Policy
- IT security Policy
- Internet and E-mail Acceptable Use Procedures
- Dignity at Work Policy
- Disciplinary Policy

Who will benefit from the policy?

This Policy applies to all employees of the UHB. For the purposes of this Policy individuals who are engaged by the Nurse Bank or as Locums are treated as employees.

The principles set out in this Policy will also apply to other individuals and groups, including agency workers, contractors, honorary contract holders, volunteers and trainees.

This policy will be off benefit to staff, managers, patients and all others who come into contact with the UHB

What outcomes are wanted from this policy?

The UHB recognises the benefits of using social media for increased networking and sharing knowledge, and does not want to

discourage individuals from using these sites, however it is important that individuals realise that things posted online can have an impact on their career and employment.

Are there any factors that might prevent outcomes being achieved? (e.g. Training/practice/culture/human or financial resources)

Communication / awareness
Understanding that this policy applies outside as well as in work

2. Data Collection

What qualitative data do you have about the policy relating to equalities groups (e.g. monitoring data on proportions of service users compared to proportions in the population)?

What quantitative data do you have on the different groups16 (e.g. findings from discussion groups, information from comparator authorities)?
Please indicate the source of the data gathered? (e.g. Concerns/Service/Department/Team/Other)
What gaps in data have you identified? (Please put actions to address this in your action plan?)

There was an equality assessment done by the All Wales policy development group and is contained within the policy. For consistency with other policies and to support its implementation effectively the UHB requires a more detailed assessment.

As the content of the All Wales Social Media Policy essentially mirrors that of the UHB's current policy the latter is used as the baseline for the new policy. The previous data gathered remains good evidence and is set out below. In addition, further qualitative data has been gathered for more recently approved policies.

Previous data gathered in September 2013.

A number of EQIAs relating to Social Media Guidelines / Policies from other NHS and public sector organisations were accessed (
http://www.google.co.uk/search?hl=en-
GB&source=hp&q=social+media+guidelines+eqia&gbv=2&oq=social+media+guidelines+eqia&gs_l=heirloom-

hp.3...40596.49969.0.50374.25.18.2.5.3.0.281.2559.1j16j1.18.0....0...1ac.1.24.heirloom-hp..3.22.2671.sxnHXDWWXEs accessed on 29.10.13)

The social media policy EQIAs from other organisations accessed include those of Hywel Dda Health Board, Sheffield Health and Social Care NHS Foundation Trust, Rotherham Doncaster and South Humber NHS Foundation Trust, Dorset County Council, Devon and Cornwall Police, Surrey Health Borough Council, Leicestershire County Council.   These EQIAs found no discriminatory or adverse impact in relation to the protected characteristics, human rights or Welsh Language.   Any specific comments are listed below.

In addition, information was obtained from OfCom reports, academic research, and market research.

The evidence available for each of protected characteristics varied greatly – there was information about the way social media is used by men & women, people with caring responsibilities and people in different age groups, but there was little information relating to the other protected characteristics, human rights or the Welsh language.

Data gathered in August 2016

The social media policy EQIAs from other organisations accessed include those of
Salisbury NHS Foundation Trust, November 2014
Doncaster and Bassettlaw Hospitals NHS Foundation Trust, September 2015
James Paget University Hospitals NHS Foundation Trust, March 2016
Nottingham University Hospitals NHS Trust, April 2016
Hywel Dda University Health Board,
Lincolnshire Community Health Services NHS Trust, May 2016

The EQIAs for the organisations above reflect a neutral or negative outcome with one raising the potential issues around means of communication. Overall the evidence available for each of protected characteristics varied greatly – there was information about the way social media is used by men & women, people with caring responsibilities and people in different age groups, but there was little information relating to the other protected characteristics, human rights or the Welsh language. Please see below for the detail.

3. Impact

Please answer the following
Consider the information gathered in section 2 above of this assessment form, comparing monitoring information with census data as appropriate (see www.ons.gov.uk Office National Statistics website) and considering any other earlier research or consultation. You should also look at the guidance in Appendix 1 with regard to the protected characteristics **stating the impact and giving the key reasons for your decision.**

Do you think that the policy impacts on people because of their age? (This includes children and young people up to 18 and older people)

The Social Media Census 2011   found that there was a correlation between use of social media and age.   A sample of 4093 respondents were asked about their social media usage and it was found that while the greatest number of users are in the less than 20 or 21-30 bracket, there were more than 8 million users over the age of 50.   The breakdown by age was found to be:
-20 87%
20s 87%
30s 77%
40s 65%
50s 59%
60s 39%
70s 28%
(total 67% of all adults)

The Social Media Census also showed that there were differences in the way social media was used by people of different ages. For example, only 1 in 20 people in their 50s were classified as 'creators' i.e. publishing their own blogs, videos etc, while 1 in 5 people in their 20s use social media in this way

According to Of com (2013), just under half (45%) of UK adults have accessed social networking in 2013. Social networking was most popular with those aged 15-24 (77%) and 25-34 (69%), By contrast, only 2% of those aged 75 or more.   The biggest growth is in the number of individuals aged 55-64 using social media, with 35% now having profiles, compared to 24% in 2011. There has

been no significant growth among any other age group since 2011.

There is evidence to suggest that there is a correlation between age and the type of social media used, with the main users of FaceBook being 25-34 year olds (26%), 18-24 year olds (23%) and 35-44 year olds (18%), and with 25-34, 35-44 and 45-54 age groups each make up around 20% of the Twitter population, but 79% of LinkedIn users being over the age of 35 (Rose McGrory, 2013)

According to Of com (2013) adults aged 16 – 44 are more likely to use a mobile phone to visit websites (70% of 16-24s, 67% of 25-34s, 59% of 35-44s vs. 45% of all UK adults).   This means that this age group are more likely to be able to access social media websites while in work.

Ofcom (2008) found that younger adults are more likely to have set up their own profile on social networking sites and to give out sensitive personal information including photographs and email addresses (34% of 16 – 24 year olds willingly post this information). The same age group are also significantly more likely to use social networking sites to talk to people they don't know and to post information of photographs of other people without their consent.

In addition, HR Magazine reported on a study undertaken by YouGov and Croner (referred to by Dorset County Council) shows that under 35s are most likely to criticise their bosses on social networking sites and that 77% of 25 – 34 year olds use social networking sites to connect with colleagues

Do you think that the policy impacts on people because of their caring responsibilities?

According to research by consulting firms Age Lessons and comScore caregivers spend about 150 minutes a month on social media sites and browse 70% more online pages than the average person.

A canadian review of existing literature found some evidence that carers use social media for support. Discussion forums were highly prevalent and constituted 66.6% of the sample, with social networking sites (14.8%) and blogs/microblogs (14.1%) the next most commonly used tools (M Hamm, A Chisholm, J Shulhan. Social media use among patients and caregivers: a scoping review)

Do you think that the policy impacts on people because of their disability? (This includes Visual impairment, hearing impairment, physically disabled, Learning disability, some mental health issues, HIV positive, multiple sclerosis, cancer, diabetes and epilepsy.)

AFB (American Foundation for the Blind) conducted a study on the accessibility of social networking sites for people with visual impairment and found that the use of 'CAPTCHAs' (or vision tests) when creating accounts, and that although screen readers can be used the layout of social networking websites (ie. With many links etc on a page) it tends to be complicated.

On the Ouch! Blog (5 April 2011), the BBC shares the views of four active online communicators with a range of disabilities about how social networks have helped with "everything from reducing feelings of isolation, simplifying access to important information, getting instant support and advice and even improving employability".

Do you think that the policy impacts on people because of Gender reassignment? (This includes Trans transgender and transvestites)

No impact found

Do you think that the policy impacts on people because of their being married or in a civil partnership?

Anecdotally, single people are probably more likely to provide personal information to strangers through e.g. online dating forums

Do you think that the policy impacts on people because of their being pregnant or just having had a baby?

No impact found

Do you think that the policy impacts on people because of their race? (This includes colour, nationality and citizenship or ethnic or national origin such as Gypsy and Traveller Communities.)

Ofcom (2008) found that Indian, Black Caribbean and Black African ethnic minority groups are more likely to have set up a social networking profile compared to all UK adults who use the internet and Black Caribbean and Black African internet users are more likely to talk to people that they don't know via social networking sites.

Do you think that the policy impacts on people because of their religion, belief or non-belief? (Religious groups cover a wide range of groupings the most of which are Buddhist, Christians, Hindus, Jews, Muslims, and Sikhs. Consider these categories individually and collectively when considering impacts)

No impact found

Do you think that the policy impacts on men and woman in different ways?

A study among young people by psychologists in Bath Department of Psychology has found there is a widening gap between the way men and women use the internet. The researchers found that whereas men were more likely to visit entertainment, games and music websites, women were more attracted to social networking sites. (mean age 20)
http://www.bath.ac.uk/news/2012/06/25/genderinternet/

ofcom (2013) also found that social networking was most popular among women, and the Social Media Census 2011 found that only 57% of men use social media compared to 65% of women.

The number of male and female users of Facebook is evenly split, though there is evidence that they use the site a little differently. Rose McGrory, 2013

LinkedIn is the only main social media site where men outnumber women**.** Rose McGrory, 2013

Do you think that the policy impacts on people because of their sexual orientation? (This includes Gay men, heterosexuals, lesbians and bisexuals)

No impact found

Do you think that the policy impacts on people because of their Welsh language?

No impact found.

The impact on the Welsh Language is minimal. Staff, however, staff with line managing responsibilities should be aware that staff might use online resources on the Welsh language (online dictionaries, learning courses, etc) as part of their work and not perhaps in a personal capacity. – Welsh Language Officer.

Do you think that the policy impacts on people's human rights?

The assessment of the Hywel Dda Social Network Policy states that the policy recognises that staff have a right to use the internet at home and the right to freedom of speech, which is balanced with the duties and responsibilities and contractual obligations staff have to the organisation.   The EQIA for the Leicester County Council policy states that issues in relation to freedom of speech were explored and the policy was clear that it was not intended to restrict employees from using social media sites, but to make them aware of the risks they could potentially face when sharing information about their professional and personal life.

4. Summary.

Which equality groups have positive or negative impacts been identified for (i.e. differential impact).
Is the policy directly or indirectly discriminatory under the equalities legislation?
If the policy is indirectly discriminatory can it be justified under the relevant legislation?

The evidence examined shows that young people and people with caring responsibilities are more likely to use social media than other groups, and men and women use social media differently.

It is possible that the Policy could be perceived as having an adverse impact on these groups of staff, especially if they rely on

social media as a key method of communicating. However, although individuals may feel that their personal use of social networking sites is being restricted, this should be viewed in the context of the negative impact that inappropriate use of social media can have on the UHB, the individual (both personally and professionally), and on colleagues, patients and others who come into contact with the organisation.

The Policy supports managers in dealing with issues arising from social media use in the same way for all groups of staff regardless of any of the characteristics detailed above.

Section B: Action

5. Please complete your action plan below. Issues you are likely to need to address include
•What **consultation** needs to take place with equality groups (bearing in mind any relevant consultation already done and any planned corporate consultation activities?)

- All Wales Leads in Information Governance, Communications, Human Resources, Information Security and Trade unions.
- UHB Chair, Rainbow LGBT FFlag Network
- UHB Welsh Language Officer

• What **monitoring**/evaluation will be required to further assess the impact of any changes on equality target groups?

The policies will be reviewed after one year by the Information Governance Sub Committee.

Equalities Impact Assessment Implementation Mitigation/Action Plan

Issue to be addressed	Responsible Officer	Action Required	Timescale for completion	Action Taken	Comments
Communication/ awareness	Marie Mantle	On approval of guidelines: Briefing via internet / clinical boards Explore option of making policy and/ or a summary available on UHB social media sites	December 2016		

6. Report, publication and Review

Please record details of the report or file note which records the outcome of the EQIA together with any actions / recommendations being pursued (date, type of report etc)

The adoption of the policy and approval of the UHB supplementary EQIA will be recorded in the PPP Committee minutes

Please record details of where and when EQIA results will be published

UHB Policy Database, UHB Intranet site, UHB Internet site

Please record below when the EQIA will be subject to review.

One year after approval of Policy, or earlier if required by changes in practice, policy or legislation.

Name of person completing	Marie Mantle
Signed	*Marie Mantle*
Date	August 2016

Name of Responsible Executive/Clinical Board Director Authorising Assessment and Action Plan for publication	Dr Graham Shortland Medical Director
Signed	
Date	

Executive Summary

The UHB has produced a supplementary more detailed EQIA to the All Wales EQIA to ensure that any potential impact has been identified and actions determined. Other similar NHS organisations were researched and internal consultation made. See below for consultation list. This assessment showed a neutral impact but there remained some need to ensure that communication mechanisms with patients and carers in various forms and media are adequate.

Further internet searches were undertaken in August 2016. Of the 6 organisations that were identified all recorded a negative or neutral impact.

Background

The aim of the policy

The specific aim of the policy is to:

- Empower and support staff in making effective and appropriate use of social media tools as an appropriate part of their work to communicate and engage;

- Help staff get the best out of the tools available whilst maintaining a safe professional environment and protecting themselves as well as the organisation;

- Provide guidance to staff on their personal responsibility as an employee of NHS Wales when using any social networking site;

- Make staff aware of the issues relating to the use of social media for both private and professional purposes;

- Provide employees with information to consider before participating in or developing any new social media application;

- Ensure staff are aware of relevant legislation and standards in relation to the publishing of information online, including codes of practice issued by professional and regulatory bodies and the implications of using social media inappropriately;

- Provide direction on further advice and information;

- Strengthen the governance framework around the use of social media;

- Ensure that staff understand what appropriate and inappropriate use is and comply with good practice and the law.

The context
The policy sets out staff's responsibilities when using social media and the implications involved. It is intended to outline areas of best practice and illustrate where challenges can arise for individuals and NHS Wales. It applies to the use of social media for business and personal purposes, both at work and outside of the work environment; i.e. in one's own time, using one's own or NHS equipment and personal or organisational social media accounts or identifiable Internet presence.

In respect to the Policy the term social media is used in reference to all Internet social networking and media sharing sites, (such as Facebook, Twitter, YouTube, Snapchat, Instagram, Flickr etc.) and to all 'blogs', 'chat', on-line commentaries, diaries, discussion forums, 'wikis' and sites allowing the posting of user generated content for mass consumption.

Involvement
The policy and EQIA was widely consulted upon at an All Wales level. Consultation included:
- All Wales Leads in Information Governance, Communications, Human Resources, Information Security and Trade unions.
- UHB Chair, Rainbow LGBT FFlag Network
- UHB Welsh Language Officer

The author has worked closely with the Equality Manager throughout the process.

The scope of the EQIA
The Policy applies to all YHB staff and includes all staff working for third party organisations.

Key findings
The EQIA found that there is overall there was a neutral impact with the exception of general communication issues. An action plan has been developed to mitigate against this impact.

Conclusions
It is concluded that no changes are required to the proposed policy as a result of the EQIA.

Recommendations
It is recommended that the Policy should be approved.