

Equality Impact Assessment

Title of work: NHS Social Media Policy 2024	Date of completion: 16 February 2024	Completed by: Ruth Fry
Description of work: This policy for NHS staff sets out how they can use social media personally and professionally, should they choose it, in a way which is compliant with legislation and best practice. This is a refresh of the 2020 version of the policy.		
Outcome of work: The policy aims to ensure audiences are informed and engaged using appropriate and efficient means of communications, without disadvantaging any groups or individuals. It aims to protect the reputation of NHS by recommending ways to communicate via social media and avoiding miscommunication or inappropriate social media use. It aims to minimise complaints or incidents in which staff misuse social media.		
Who: Stakeholders: (who will this work affect?) The policy applies to all NHS employees, which includes people with protected characteristics. The nature of social media is that its audience is also broad. In general, NHS employees will be communicating via social media with residents of the Highlands and Argyll and Bute, but audiences may sometimes be larger, for example when working across Board boundaries or recruiting from further afield. It should be assumed that social media audiences include people with protected characteristics.		

How do you know:

Stakeholder engagement: How will you know what impact this will have - please detail what work you have done to find this out? Remember to consider the way in which you use language matters.

We have looked at the demographics of the population served by NHS: <https://www.nhshighland.scot.nhs.uk/about/our-population-and-people/>

And the public health profiles: <https://www.nhshighland.scot.nhs.uk/about/publications-and-public-records/public-health-profiles/>

We have also looked at the data available on our workforce: <https://www.nhshighland.scot.nhs.uk/media/whdit3vv/nhs-highland-3-year-strategic-workforce-plan.pdf>

- We have used data from Ofcom and Statista to inform us of wider audience usage of social and other media: <https://www.ofcom.org.uk/research-and-data/multi-sector-research/cmr/2023>
- <https://www.statista.com/statistics/280295/market-share-held-by-the-leading-social-networks-in-the-united-kingdom-uk/#:~:text=Leading%20social%20networks%20in%20the%20UK%202023%2C%20by%20market%20share&text=In%20June%202023%2C%20Meta's%20Facebook,network%20market%20in%20the%20UK.>

We also looked at comments and feedback on our corporate social media accounts over the past 6 months. These included a comment requesting subtitles for Teams Live events and a comment requesting BSL interpretation.

The draft policy was shared with the staff Listening and Learning Panel. No comments relevant to the EQIA were received.

What will the impact of this work be? (see appendix 1 for list of protected characteristics and other groups that you may wish to identify)

Social media is generally thought of as a preferred medium for younger people. However, this differs widely by platform and older generations are also increasingly online and active users. The impact on age groups is therefore dependent on the platform used.

Many disabled people can and do use social media, sometimes with adaptive technology. We need to make sure we are not excluding people from engaging with NHSH because they cannot or do not use social media, or because we have posted content which is not accessible.

People may also be excluded from using social media due to digital exclusion, literacy, or language difficulties. For a small minority of people in our audience, their religion may exclude them from accessing social media or some aspects of social media due to beliefs about technology or imagery.

Given all of the above what actions, if any, do you plan to take?

Social media use itself is not necessarily discriminatory, but it may be used in a way which excludes some people from information and engagement. EQIAs for NHSH projects and policies should take into account the communications needs of their audiences and whether social media is appropriate. To remind staff of this, the Social Media Policy 2023 has been updated to include:

You also need to make sure your posts are equitable: this includes video or audio content being accompanied by subtitles or a transcript and ensuring your content is sensitive to diverse communities. Consider the audience you are trying to reach and, if they are less likely to use social media for any reason, such as digital exclusion, consider alternative ways of communicating with them.

**Approved by:
Area Partnership Forum**