

Social media and comment moderation policy

No	Title	Description
1.	Summary	This Policy sets out the ICB's detailed arrangements for Moderating comments on NCL ICB's and NCL ICS social media channels
2.	Author	Communications and Engagement Team
3.	Accountable Director	Ian Porter, Executive Director of Corporate Affairs.
4.	Applies to	Staff at all levels and external parties where appropriate.
5.	Groups/individuals who have overseen development of this policy	Communications and Engagement Team
6.	Groups which were consulted and have given approval	Communications and Engagement Team
7.	Equality Impact Analysis	N/A – an equality impact analysis will be carried out on the wider social media policy currently in development
8.	Ratifying committee and date of final approval	Executive Management Team, 1/2/22
9.	Version	Version 1
10.	Locations available	The ICB's website and staff intranet.
11.	Related documents	N/A – but will be linked to the ICB's Social Media policy which is currently in development
12.	Disseminated to	All staff, public website, NCL ICB complaints team
13.	Date of implementation	1/2/22
14.	Date of next review	1/2/23

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1. Introduction

North Central London (NCL) ICB and North Central London Integrated Care System (ICS) use social media channels (Twitter, Facebook, YouTube, Linked-in, Next Door, Instagram) to support and encourage the use of social media as a way of engaging with stakeholders, and to promote debate and discussion about health and wellbeing across north central London.

Content delivered by these channels includes (but is not limited to):

- NCL event information, campaign news and messages, engagement opportunities, health campaigns and information, and NCL ICB guidance material such as patient information leaflets.
- Links to relevant NHS information and other information produced by NCL partners, the community and voluntary sector, local authorities and news organisations on their digital channels. This can include retweets, blogs, public information and marketing material.

We welcome engagement and feedback from our residents and followers. The NCL ICB Communications and Engagement Team reads all comments and direct messages sent and ensures that any feedback, suggestions, and emerging themes are passed on to the relevant teams in the NCL ICB.

This policy outlines how we use social media as NCL ICB and our policy for moderating comments and questions that we receive through these channels. The policy is based on best practice and in line with other NHS organisations' approaches, including NHS Digital and NHS England. The ICB is currently developing a broader social media policy for the organisation, and this comment moderation policy will eventually form part of that policy.

We will publish this policy on our website so that people are aware of it. Our website is linked to in the bios/introductions at the top of our social media platforms.

2. Likes, shares, retweets

Likes, shares and retweets do not imply an endorsement on the part of the NCL ICB. We may like, retweet and share links that we believe are relevant to the work of NCL.

3. Following, sharing

NCL ICB's decision to follow a Twitter user and share or like a Facebook Post or YouTube video does not imply endorsement of any kind. We do this when we believe it is relevant to our work. This could include following, sharing or liking social media accounts of companies and other commercial enterprises (and/or their employees who comment on NCL-related issues).

4. Monitoring

We commit to monitoring our social media channels during regular office hours: 9am to 5pm, Monday to Friday. We aim to acknowledge questions and comments on the next working day and look to take relevant questions off line by directing people to the ICB's traditional 'contact us' channels, [outlined on the ICB's website](#). Where we can reply directly to a question, we aim to do so as soon as resources allow but within two working days.

5. Complaints, media requests, Freedom of Information Act requests and personal issues

We encourage people to follow the ICB's traditional channels to make a media request, freedom of information (FOI) request or complaint.

You can find out how to do this on our [website 'contact us' page](#).

6. Pre-moderated comments

Where social media platforms (YouTube, Wordpress blogs) allow pre-moderation, we reserve the right to edit lengthy comments and will apply our comment moderation policy, outlined below, when moderating comments.

7. NCL ICB staff

Some NCL ICB staff may tweet (or post on other platforms) under their own names or pseudonyms. Despite their professional affiliation with NCL ICB, their tweets or posts may not represent the official position of NCL ICB. The NCL ICB Social Media Policy (currently in development) will have detailed guidance for staff to help them make appropriate decisions about their use of social media platforms. This policy is being developed as a separate policy from this 'Social media and comment moderation policy'.

If a member of staff is concerned about something they read on social media they should alert their line manager and inform the NCL ICB Communications Team.

8. Comments moderation policy

We will normally allow comments as long as they:

- respect other people. Comments should not be malicious or offensive in nature, and should not constitute a personal attack on a person's character
- do not incite hatred on the basis of race, religion, gender, nationality or sexuality or any other personal characteristic
- do not reveal personal details, such as private addresses, phone numbers, email addresses or other online contact details
- are on-topic; we ask that people please do not post comments that are not related to the particular subject being discussed.
- do not provide misleading information about NHS services and health care
- are not persistent or repetitive negative messages which aim to provoke a response and/or don't constructively add to the conversation
- are reasonably concise and do not constitute spam
- do not impersonate or falsely claim to represent a person or organisation
- are not party-political in nature (the NHS is always high on the political agenda and while we acknowledge that references to political parties and their policies may often be inevitable, we reserve the right to exclude comments which are purely party-political in nature, seek to advertise political events, or advocate or campaign on a specific political position.
- do not include swearing, hate-speech or obscenity
- do not break the law – this includes libel, condoning illegal activity and breaking copyright
- do not advertise commercial products and services – you can mention relevant products and services, as long as they support your comment.

- do not link to any inappropriate, offense or illegal material. We reserve the right to remove links-only comments.

9. Accounts will be muted, blocked and reported if they contravene the moderation policy

Where we choose to remove or not to publish a comment for whatever reason, we will make reference to our comment moderation policy. This is not about censoring people's views. The aim is to ensure that comments relate to the particular subject being discussed. Moderation will not be used to suppress legitimate, reasoned discussion. We may also report posts and comments that breach this moderation policy to the appropriate social media platform.

10. Complaints about this policy

If you have any questions about the policy please email the NCL ICB Communications Team on NclICB.communications@nhs.net. If you have any complaints about how this policy has been applied, please contact us via our complaints team: nclICB.complaints@nhs.net