



Woodbrook Medical Centre

Patient Social Media and Acceptable Use Policy (England)

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1 Introduction

1.1 Policy statement

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

- a. Understanding what to do when an unacceptable social media post has been placed by a patient about either the practice or its staff
- b. The acceptable use of mobile phones and other portable electronic devices within Woodbrook Medical Centre

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](#). Whilst 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 [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. This is further detailed within the [Communication Policy](#).

Should there be any concerns regarding the level of care or treatment received, patients may only complaint via the [Complaints procedure](#) and in a manner that conforms to extant guidance in common with other NHS organisations. Raising any grievance via social media does not conform to the legislation and as such will not be considered to be a complaint.

in addition to the above linked policies, this document is to be read in conjunction with the following:

- [Access to Medical Records Policy](#)
- [Audio, Visual and Photography Policy](#)
- [Caldicott and Confidentiality Policy](#)
- [Dealing with Unreasonable, Violent and Abusive Patients Policy](#)
- [UK General Data Protection Regulation \(UK GDPR\) Policy](#)

1.2 Status

Woodbrook Medical Centre aims to design and implement policies and procedures that meet the diverse needs of our service and workforce, ensuring that none are placed at a disadvantage over others, in accordance with the [Equality Act 2010](#). Consideration has been given to the impact this policy might have regarding the individual protected characteristics of those to whom it applies.

This document and any procedures contained within it are non-contractual and may be modified or withdrawn at any time. For the avoidance of doubt, it does not form part of your contract of employment. Furthermore, this document applies to all employees of Woodbrook Medical Centre and other individuals performing functions in relation to Woodbrook Medical Centre such as agency workers, locums and contractors.

2 Principles of social media posts

2.1 Patient access to information

At Woodbrook Medical Centre, we wish to ensure that our patients have access to current and relevant information. Therefore, in addition to our website, we post information on social media platforms.

Staff are not permitted to use any of Woodbrook Medical Centre'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, Woodbrook Medical Centre will also monitor social media platforms for comments and feedback

Any information posted is to be specific to Woodbrook Medical Centre. 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 can be sought from the BMA guidance titled [Social media, ethics and professionalism](#) regarding the ethics and use of social media.

2.2 Social media 'friend' request by a patient

Should any patient send a 'friend' request over a social media platform then the above 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.

Refer to the [Communication Policy](#) for further advice on this subject.

2.3 Inappropriate postings by a patient

All staff are requested to remain vigilant whilst visiting any social media site especially surrounding any detrimental comment being placed about Woodbrook Medical Centre or any of our staff.

The BMA provides advice on this subject in their document titled [Dealing with abuse of practice staff on social media from patients](#).

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](#) (post)
- [LinkedIn](#) (feed)
- [X](#) (post)
- [Instagram](#) (post)

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 Woodbrook Medical Centre 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 Communications Act 1988](#)
- [Communications Act 2003](#)

2.4 Should the patient not be willing to remove the 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, Woodbrook Medical Centre could bring a claim on the basis that the publication amounts both to a misuse of their 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 Woodbrook Medical Centre or any staff member, then they should be advised that, whilst Woodbrook Medical Centre 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 – Patients and the public: your responsibilities.

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 Woodbrook

Medical Centre or its staff, it could be suggested that the patient-doctor relationship has broken down in accordance with the GMC's guidance within [Good Medical Practice](#).

In addition to the GMC guidance, additional resources to manage the removal of a patient can be found within the following:

- MDU: [Managing patients for a GP practice list](#)
- [Dealing with Unreasonable, Violent and Abusive Patients Policy](#)
- [Removal of Patients Policy](#)
- [Respect our staff](#) poster

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 will also be offered outlining the process.

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 our patients, and that unacceptable behaviour will not be tolerated and will be managed accordingly.

3 Patient recordings within the practice

3.1 Patients requesting to record their consultation

Whilst 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 patients' 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 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 Overt 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 where a patient deems this to be absolutely necessary
- To avoid a patient feeling the necessity to record any consultation, we will highlight the fact that we will always take proactive steps 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 [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 consultation, what should I do?](#)
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Requirements are detailed within the Patient Social Media Guidance at [Annex A](#).

3.3 Patients posting their consultation recording online

Should any consultation be posted online, then the [BMA](#) has produced a letter template requesting its removal.

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 [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.

Further information can be found in the BMA document titled [Patients recording consultations](#) and the [Audio, Visual and Photography Policy](#).

Annex A – Patient social media guidance

Patient Social Media Guidance

At Woodbrook Medical Centre we have a Facebook and Instagram page which provides a range of useful information for our patient population.

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 at Woodbrook Medical Centre are expected to always adhere to the following code of conduct:

1. Woodbrook Medical Centre 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. Whilst 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 the Woodbrook Medical Centre Facebook and Instagram pages will be deleted and the post reported.
5. Patients are not permitted to take photographs in the waiting room or areas where other patients are present, nor are photographs of staff permitted to be taken.
6. Patients must not post comments on social media that identify any staff.
7. Patients can leave a review about the practice and the following <https://www.woodbrookmedicalcentre.co.uk/> can enable the practice manager to respond appropriately.
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 policy which patients are to use should they wish to make a complaint. We will only respond to complaints made to the Woodbrook Medical Centre in accordance with the Woodbrook Medical Centre's policy.

If a complaint is made on the Woodbrook Medical Centre's Facebook and/or Instagram page, it will be deleted.