Guidance on Countering Abuse on Social Media
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Introduction

NHSGGC, and many of our staff, engage with our stakeholders through social media accounts. These are usually rewarding encounters for individuals and the organisation.

There are, however, occasions when a member of staff may be the subject of hostile, abusive comments. Our staff and our organisation are not alone in facing this type of social media. There have been cases of pupils using social media to make hostile comments toward teachers and this also extends across many areas of public life and public service including council officials, politicians and other public servants.

When it happens, it can be distressing for the individual and the member of staff can understandably look to their employer for some support.

This guide includes advice, information and steps to take if a member of staff or the organisation is facing social media posts that are abusive or offensive, or include potentially defamatory or criminal material.

Potential responses to abusive or inappropriate comments on social media

Depending on the nature of the comments, there are four options available when considering how to respond.

These are:

- **Option 1:** Ignore and block
- **Option 2:** Engage with the individual to seek removal
- **Option 3:** Report to social media platform
- **Option 4:** Report to the police and seek legal opinion.

The following guidance sets out when these options might be used and the steps to be taken in each instance.
Option 1: Ignore and block

In 2019, the Center for Countering Digital Hate (CCDH) issued guidance on dealing with hate on social media “Don’t Feed the Trolls”. This practical guide advises that:

“Trolls know that when public figures engage with abusive trolls to defend their reputation or their values – a normal behavioural response – this inadvertently spreads and legitimates the message and tricks social media algorithms into pushing it into a broader array of users’ timelines. This helps trolls spread their message to far more people than they could alone.

It is a basic behavioural response to wish to correct someone who we believe is wrong. But that instinctual response must be overcome because engaging with erroneous material and allegations legitimises that view and lends it credibility it does not deserve.”

There is good evidence that when people are engaged in deliberate trouble making or ‘trolling’ on social media the best response is to block and ignore. This is similar to our advice to hang up on abusive telephone calls.

CCDH recommend the following actions:

- Resist the urge to respond
- When targeted for abuse, block the individual immediately.
NHSGGC operates a number of social media accounts and reserves the right to block users who are in breach of the terms of use without prior notice. This will be done when NHSGGC believes the comment or post is in breach of the following terms of use:

- **Contributions must be civil and tasteful.** They must not be defamatory, libellous, in breach of the General Data Protection Regulations, contain obscenities or foul language.
- **Contributions must be constructive and polite,** not mean-spirited or contributed with the intention of causing offence or trouble. Users who persistently post comments which are unrelated to the item being commented on may be blocked and their comments deleted.
- **Advertising or promotional postings will not be accepted** unless with the prior consent of NHSGGC.
- In line with NHS guidelines, **no political campaigning or electioneering will be permitted**.
- **NHSGGC’s decision is final.**

**Action:**

Whilst NHSGGC and its staff do not have the following of some public figures, consideration should be given to **nature of the comment,** its **impact** and **potential** to be seen by others and whether the right course of action should be to **ignore and block** rather than **engage** with it.

The Corporate Communications Department can support you to consider this option and, if appropriate, block individuals from NHSGGC’s social media accounts. When blocking an individual, a record should be kept of the reason for this.

For all inappropriate comments you should **take a screenshot showing the message, the account name, time and date.**
Option 2: Asking the individual to remove the post

A second option would be to seek to have the comment removed.

Most social media platforms expect you to have made an attempt to ask the person who posted the offensive comment, image, video etc, to remove it before reporting the issue to them (See Option 3).

If the comment is made on an official NHSGGC social media account then the Corporate Communications Directorate can remove it. All official social media platforms make it clear that NHSGGC reserves the right to delete posts or comments from its social media account without prior warning.

If the comment is posted on another site, then the member of staff named in the post, with the support of a line manager if appropriate, should initially make direct contact with the individual requesting the post is removed.

This can either be done offline or online and there are templates for use in different scenarios in Appendix 1.

If a request from those directly involved does not resolve or address the situation, then consideration should be given to a formal letter to an identified individual on behalf of NHS Greater Glasgow and Clyde (see Appendix 2).

Action:

Record the inappropriate comment – take a screenshot showing the message, the account name, time and date.

Consider whether you wish to have the content removed, whether the comment on is an official NHSGGC account or another site and who would be an appropriate person to approach the individual who posted the comment.

The Corporate Communications Directorate can support you to consider these issues and to escalate as appropriate.
Option 3: Report the issue to the social media platforms

Another potential route for the removal of the content is to report an issue to the social media platform.

The member of staff affected does not generally need to be a site user/member to complain however most social media platforms will expect you to confirm the issue affects you or someone for whom you are the legal representative before reporting an issue.

You can report an issue affecting you, your own child, or anyone for whom you are the legal guardian or representative.

NHSGGC may report issues on behalf of others, but unless acting as the legal guardian or representative, the social media platform is not obliged to assist.

Action:

Record the inappropriate comment – take a screenshot showing the message, the account name, time and date.

To find out how to complain/report an issue go to the specific platform home page and look for the ‘help’ button. If you need assistance with this, the Corporate Communications Directorate can help individuals, their legal guardians or representatives to identify the steps to take.
Option 4: Responding to criminal or defamatory content

“Free speech includes not only the inoffensive but the irritating, the contentious, the eccentric, the heretical, the unwelcome and the provocative provided it does not tend to provoke violence. Freedom only to speak inoffensively is not worth having.”

Lord Justice Sedley, 2000, Redmond-Bate v DPP.

Whilst a comment made against a member of staff may be considered rude or upsetting, it doesn’t automatically follow that it will breach defamation or criminal legislation.

When a post includes messages that:

- Constitute threats of violence
- Specifically target individuals that constitute harassment or stalking
- Can be considered grossly offensive or false, then these may be defamatory or contain criminal content.

Support will be provided to the individual against whom the comment is made to report this and to consider whether any legal recourse should be followed.
Action:
When you suspect that you may be the subject of a message containing defamatory or criminal content, you should take the following steps:

- **Record** – take a screenshot showing the message, the account name, time and date
- **Report** – report directly from the account to the social media platform. Keep your record in case you wish to refer to the police or a lawyer
- **Recruit help** – consult with your manager, professional association or trade union and the Corporate Communications Directorate.

Do not ignore any post that you think may be defamatory or criminal.

The Corporate Communications Directorate/Board Administration can support you to get advice from Police Scotland, or to consider if legal support would be usefully sought from your professional or trade body.
Appendix 1

Template responses

If we consider it appropriate to respond there are agreed templates for a number of scenarios. We promote a culture of risk assessment/management, early intervention to prevent the escalation of harmful behaviours, collaboration, compassion, de-escalation and the development of positive, respectful relationships. The templates given below are examples of responses we may choose to use, in discussion with you:

• Single first ‘angry’ complaint

We note that this account [insert account name here e.g. @TwitterHandle] has posted comments that would be better addressed to the team responsible for care, or to our complaints team. Please contact complaints@ggc.scot.nhs.uk or see our website for advice www.nhsggc.org.uk/complaints

You also have the option of independent support and advice from www.patientadvicescotland.org.uk or by calling them on 0800 917 2127

The views of people who use our services help us to make continuous improvements. Our complaints process is a key component of this.

Please see our Social Media terms of use www.nhsggc.org.uk/socialmedia

Twitter version

These comments would be better addressed to the care team or to complaints@ggc.scot.nhs.uk

For advice see www.nhsggc.org.uk/complaints Independent support and advice from www.patientadvicescotland.org.uk or 0800 917 2127
• **Multiple complaints from one person/account**

NHSGGC, and many of our staff, engage with our stakeholders through both official and personal social media accounts. These are usually rewarding encounters for individuals and the organisation. However we note that this account [insert account name here e.g. @TwitterHandle] has repeatedly posted comments that would be better addressed to our complaints team.

Please contact complaints@ggc.scot.nhs.uk or see our website for advice www.nhsggc.org.uk/complaints

You also have the option of independent support and advice from www.patientadvicescotland.org.uk or by calling them on 0800 917 2127

Please see our Social Media terms of use: www.nhsggc.org.uk/socialmedia

**Twitter version**

These comments would be better addressed to the care team or to complaints@ggc.scot.nhs.uk

For advice see www.nhsggc.org.uk/complaints

Independent support and advice from www.patientadvicescotland.org.uk or 0800 917 2127

• **Comments from someone already engaged with our complaints process**

NHSGGC, and many of our staff, engage with our stakeholders through both official and personal social media accounts. These are usually rewarding encounters for individuals and the organisation. However we note that this account [insert account name here e.g. @TwitterHandle] has repeatedly posted comments concerning matters that are already in progress with our complaints team. We will not engage further in a public forum.
There is independent support and advice available from www.patientadvicescotland.org.uk or by calling them on 0800 917 2127

Please see our Social Media terms of use: www.nhsggc.org.uk/socialmedia

@TwitterHandle has posted comments concerning matters that are in progress with our complaints team. We will not engage further in a public forum. Independent support and advice from www.patientadvicescotland.org.uk or 0800 917 2127

• Rude, mean, offensive

NHSGGC, and many of our staff, engage with our stakeholders through both official and personal social media accounts. These are usually rewarding encounters for individuals and the organisation. However we note that this account [insert account name here e.g. @TwitterHandle] has repeatedly posted comments that are against our policy and request that they are removed immediately.

We expect contributions to be constructive and polite, not mean-spirited or show an intention of causing offence or trouble. If you wish to give constructive feedback please use either our patient feedback form online www.nhsggc.org.uk/patientfeedback or Care Opinion www.careopinion.org.uk/youropinion

NHSGGC reserves the right to block, without prior notice, users who are in breach of our terms of use. (www.nhsggc.org.uk/socialmedia)

Twitter version

@TwitterHandle has posted comments that are against our social media policy. Please remove immediately.

For feedback use www.nhsggc.org.uk/patientfeedback or Care Opinion www.careopinion.org.uk/youropinion
• **Defamation, libel, GDPR**

NHSGGC, and many of our staff, engage with our stakeholders through both official and personal social media accounts. These are usually rewarding encounters for individuals and the organisation. However we note that this account [insert account name here e.g. @TwitterHandle] has posted contributions that may be defamatory, libellous, or in breach of the General Data Protection Regulations and request that they are removed immediately.

In these cases we will report accounts to the social media platform concerned and may refer to the police and law enforcement agencies.

NHSGGC reserves the right to block, without prior notice, users who are in breach of our terms of use. ([www.nhsggc.org.uk/socialmedia](http://www.nhsggc.org.uk/socialmedia))

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**Twitter version**

@TwitterHandle has posted comments that may be defamatory, libellous, or in breach of GDPR. We request that they are removed immediately. We will report accounts to Twitter and may refer to the police and law enforcement agencies.

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• **Violent, aggressive, threatening**

NHSGGC, and many of our staff, engage with our stakeholders through both official and personal social media accounts. These are usually rewarding encounters for individuals and the organisation. However we note that this account [insert account name here e.g. @TwitterHandle] has posted contributions that suggest violence, aggression, or threats and request that they are removed immediately.

We will always seek to address all incidents involving any person(s) who have abused, threatened or assaulted a NHSGGC employee in circumstances relating to their work. NHSGGC will also seek to address all incidents involving any person(s) who have abused, threatened or assaulted any NHSGGC patients, visitors, carers, students or
contractors. This could include the option to pursue prosecution. In these cases we will report accounts to the social media platform concerned and refer to the police and law enforcement agencies.

NHSGGC reserves the right to block, without prior notice, users who are in breach of our terms of use. (www.nhsggc.org.uk/socialmedia)

### Twitter version

@TwitterHandle has posted contributions that suggest violence, aggression, or threats. We request that they are removed immediately. We will report accounts to Twitter and refer to the police and law enforcement agencies.

### Unauthorised photography, filming or recording that has been posted on social media

Everyone using our facilities and services has a reasonable expectation of privacy and dignity during their time with us.

We note that this account [insert account name here e.g. @TwitterHandle] has posted contributions that contravene this policy and request that they are removed immediately. NHSGGC will report these postings to the channel concerned as a breach of confidentiality. There is more information on this policy here www.nhsggc.org.uk/unauthorisedphotography

If we ask you to stop recording on our premises and you refuse to stop or delete, we will ask you to leave the premises. If you do not, the team lead/manager may involve security and/or the police depending on circumstances.

We reserve the right to block from our social media feeds users who are in breach of our terms of use, without prior notice. (www.nhsggc.org.uk/socialmedia)
Twitter version

@TwitterHandle has posted pictures/film that breach confidentiality. We request that they are removed immediately.

We will report these postings to @Twitter. More information here www.nhsggc.org.uk/unauthorisedphotography
Appendix 2

Formal letter

If the previous responses do not resolve or address the situation we may send a formal letter to an identified individual on behalf of NHS Greater Glasgow and Clyde. The text proposed is as follows:

NHS Greater Glasgow and Clyde

Dear [NAME]

Social media posts containing Violence, Aggression, Threat, Defamation, Libel, GDPR breach

NHS Greater Glasgow and Clyde, and many of our staff, engage with our stakeholders through both official and personal social media accounts. These are usually rewarding encounters for individuals and the organisation. However we note that this account [insert account name here e.g. @TwitterHandle] has posted contributions that may promote violence or aggression or be threatening, defamatory, libellous, or in breach of the General Data Protection Regulations. We understand that you are responsible for the account and request that these posts are removed immediately.

In such cases we may report accounts to the social media platform concerned and may refer published posts to the police and law enforcement agencies. We will not accept abuse or intimidation of our staff.

We reserve the right to block, without prior notice, users who are in breach of our terms of use. ([www.nhsggc.org.uk/socialmedia](http://www.nhsggc.org.uk/socialmedia))

Yours sincerely