

Human Tissue Authority
151 Buckingham Palace Road
London
SW1W 9SZ

[REDACTED]
By email to [REDACTED]

Tel 020 7269 1900
Web www.hta.gov.uk
Email enquiries@hta.gov.uk
Date 27 March 2018

Dear [REDACTED]

Freedom of Information request

Thank you for your request for information under the Freedom of Information Act (FOIA), which was received by the Human Tissue Authority (HTA) on 9 March 2018. Your email outlined the following request:

Dear Sir or Madam,

I have sent two FOIs, the first in January and the second in February and I still have not received an acknowledgement and it is now overdue. Please can someone acknowledge my FOI and respond? Otherwise I am left with no option but to go to the information commissioner as this is a breach of the FOI Act. Once again my request is as follows - Under the Freedom of Information Act I would like to request the following information:

1. Does your organisation have a Facebook Page(s)? If yes, what is/are the url(s) and when were they set up?
2. Does your organisation advertise or spend any money on Facebook? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since 2004?
3. Does your organisation have a Twitter Account? If yes, what is/are the url(s) and when were they set up?
4. Does your organisation advertise or spend any money on Twitter? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since 2006?
5. Does your organisation use Google G-Suite services (Google services) or does your organisation rely on google for any services (such as email hosting)? If yes, what are the services, when were they agreed and how much did they cost?

6. Does your organisation advertise or spend any money on Google? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since the payments first began?
7. Is there an official policy for the use of organisational Facebook or Twitter Accounts (ie how to post, what to use it for and when to delete or preserve records)? If there is a policy (or policies) please may I be provided with them?

Many thanks in advance and I look forward to your reply,

Response

Further to the email that I sent to you on 12 March 2018, I would like to reiterate my apology for our oversight in failing to respond to your previous requests for this information in January and February. As outlined in my email, please be assured that we have addressed this in line with our complaints policy and have taken appropriate action to rectify the issue.

I have set out our response to your enquiry in accordance with your request for information:

1. Yes: <https://en-gb.facebook.com/HumanTissueAuthority/> | Joined May 2011.
2. No.
3. Yes: https://twitter.com/HTA_UK | Joined May 2011.
4. No.
5. We use Google Analytics. No cost associated with this service.
6. No.
7. Yes. *The HTA Social Media Policy covers our purpose for being on social media, rules of engagement for staff and their responsibilities, and references the civil service code for online participation. I have attached a copy of the policy as requested. Please be advised however, that this policy is currently in the process of being updated.*

Further information

If you are unhappy with the way the HTA has handled your request for information in this case, you may in the first instance ask us for an internal review by writing to us at the above postal or email address.

If you remain dissatisfied with the handling of your request or complaint, you have the right to appeal directly to the Information Commissioner for a decision, at the address below. There is no charge for making an appeal.

Information Commissioner's Office
Wycliffe House
Water Lane

Wilmslow
Cheshire SK9 5AF

Telephone: 08456 30 60 60 or 01625 54 57 45

Website: www.ico.gov.uk

Yours sincerely

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Social Media Policy

Reference	HTA-POL-019	Version	14.0
Author(s)	[REDACTED]	Date approved	April 2014
Reviewed by	[REDACTED]	Next review due	April 2016
Approved by	[REDACTED]	Owner	[REDACTED]
Protective Marking	NONE	Distribution	All HTA staff

Review

1. This policy will be reviewed annually.

Description

2. This policy aims to present clear and practical guidance for HTA employees accessing digital channels, including social networking sites such as [Facebook](#), [Twitter](#), and LinkedIn on a personal and professional basis.
3. This policy also applies to multi-media, social networking websites, blogs and wikis for both professional and personal use in relation to the HTA.
4. This policy applies to all HTA employees.

Purpose

5. The purpose of this document is to:
 - Improve the use, monitoring and evaluation of digital channels
 - Ensure that staff make best use of social media
 - Enable the HTA to meet business objectives around communicating with stakeholders
 - Provide a framework for the HTA to respond efficiently to fans and followers in an appropriate manner
 - Avoid damage to the HTA brand online
 - Work with existing HTA policies, such as the [information governance policy](#), [Information systems policy](#), [Disciplinary policy](#) and [Dignity at work policy](#)/Bullying and harassment policy.
6. Digital channels, including social media must be used responsibly, and this policy outlines the required behaviour of HTA staff when using digital channels for both

professional and personal use. The intention is to encourage staff to engage with social media channels, but to ensure staff are mindful of the digital environment and the risks within it, given these channels are often open public forums where it is easy to post comments, but very difficult to remove them.

Rules of engagement for staff

- The principles covering the use of social media in both an official and personal capacity are the same as those that apply for any other media (see [information governance policy](#)).
 - Social media is a public forum and the same considerations should apply, for example, to speaking in public, writing something for publication either officially or outside of work, or participating in meetings or conferences.
 - You should consider yourself an ambassador of HTA when engaging with HTA-related social media communities or platforms and should act in a manner that creates a positive image.
 - Many staff members will have personal social media profiles and use social media in their own time. In the digital world the boundaries between professional and personal can easily become blurred – so it is important to be careful. You should check privacy settings to ensure you are happy with them and take care to understand a social networking site's terms of service.
 - The Communications Team generates content for the website and social media activity from sources such as the e-newsletter and the forward look calendar, so it is important that you contribute to these channels with news and events and/or inform the Communications Team.
7. If you have any questions about whether to promote the HTA or engage with the HTA via social media, contact the Communications Team.

Responsibilities of staff

8. HTA staff can now access social networking sites such as [Facebook](#) and [Twitter](#) at work and it is important that staff bear the following in mind:
- Only disclose and discuss publicly available information and be mindful not to disclose protectively marked/confidential information, information about individual cases online, or official information without authority.
 - Take particular care if commenting on government policies and practices. Do not take part in any activity which compromises, or might be seen to compromise the HTA. For example do not sign up for online petitions and polls or comment on government policy in your capacity as a HTA employee.
 - Avoid commenting altogether on controversial issues affecting Department of Health and/or Department of Health Ministers. Remember that even anonymous comments may be traced back to you or the HTA's IP address and that even a simple Google search could link you to the HTA. Posts can be traced and are visible long after they have appeared in a live feed.
 - Do not use any personal or professional social media account to engage directly with HTA stakeholders about issues relating to the HTA, unless you have legitimate reasons to do so. The Communications Team coordinates the HTA social media channels and

any suggested content or responses for those pages should go through them (see below).

- If you comment on any aspect of HTA's business while interacting with the HTA social media channels via personal social media accounts, identify yourself as a HTA employee and include a disclaimer declaring any conflicts of interest when posting online. The disclaimer should be something like "the views expressed are mine alone and do not necessarily reflect the views of the HTA."
- Do not post inappropriate comments about colleagues or stakeholders online and avoid personal attacks generally. You may be subject to disciplinary action, see the [Disciplinary policy](#).
- Do not use social networking sites to bully or intimidate colleagues see the [Dignity at work policy](#)/Bullying and harassment policy.
- Do not use HTA's logo or brand identity for any kind of personal use. If in doubt talk to the Communications Team.
- Do not make defamatory remarks about HTA or misrepresent the organisation by posting false or inaccurate statements about the work of HTA.
- Adhere to the [information governance policy](#) and [Information systems policy](#) in terms of use of social media and websites more generally.

Examples of reasonable use include:

- Following or becoming a fan of the HTA's [Facebook](#), [Twitter](#) or LinkedIn channels or interact with them
- Re-tweeting or 'liking' content from the HTA Twitter or Facebook accounts
- Participating in discussion forums on the intranet
- Sharing posts from any of HTA Facebook pages onto your own timeline
- Promoting HTA social media channels in email signatures, on business cards, on presentation slides, on publications, on inspection and when handling enquiries.
- Raising awareness of HTA employment opportunities

Responsibilities of Communications and Public Affairs Team

9. The Communications and Public Affairs Team's responsibilities include:
- Maintaining the HTA's social media presence, including posting updates etc. If you want to post something on HTA social media channels or have any suggestions about how to use these channels more effectively, talk to the Communications Team.
 - Promoting social media channels as a source for information and promoting transparency and accountability.
 - Wherever possible, integrating and aligning communications through online and offline communication channels.
 - Updating social media channels, regularly broadcasting tweets, retweets, posts and links to drive traffic to the HTA website and promoting news, events and publications.
 - Consulting and engaging in conversations with 'fans' and followers to moderate comments, answering enquiries and explaining the HTA's remit. The Communications Team monitors this and may ask colleagues for help in responding
 - Following and 'liking' appropriate stakeholders within the health arena, as well as Journalists and key opinion leaders, to encourage awareness of HTA news.
 - Monitoring and evaluating activity on social media channels to understand user behaviour and identify opportunities.

- Ensure that they respond appropriately and that the [HTA house style](#) applies to written content on social media.

Revision history

10. Document each version or draft providing a simple audit trail to explain amendments.

Date	Version	Comments
September 2012	1	
November 2012	2	
October 2013	2	■
April 2014	14.0	■

APPROVED

Annex: The civil service code for online participation

Staff should consider the civil service code for online participation:

- Disclose your position as a representative of the organization you work for unless there are exceptional circumstances, such as a potential threat to personal security. Never give out personal details like home address and phone numbers.
- Always remember that participation online results in your comments being permanently available and open to being republished in other media. Stay within the legal framework and be aware that libel, defamation, copyright and data protection laws apply. This means that you should not disclose information, make commitments or engage in activities on behalf of the HTA unless you are authorised to do so.
- Be aware that comments online may attract media interest in you as an individual, so proceed with care whether you are participating in an official or a personal capacity. If you have any doubts, take advice from your line manager or Communications Team.
- Be credible – be accurate, fair, thorough and transparent.
- Be consistent – encourage constructive criticism and deliberation.
- Be cordial, honest and professional at all times.
- Be responsive – when you gain insight, share it where appropriate.
- Be a civil servant – remember that you are an ambassador for the HTA.
- Wherever possible, if commenting on anything that relates to the HTA or its business, disclose your position as a representative of the HTA.
- Consider when a conversation should be taken offline for example if it is circling.
- Do not engage with users who are aggressive/abusive. Consider the [Complaints policy](#).
- Note that there are FOI implications with social media as FOI's can now be received through Twitter and Facebook. FOIs received through social media will be treated according to the HTA FOI policy.
- Social networking sites should not be used for raising and escalating concerns. Any concerns about the HTA raised via social media will be dealt with using the appropriate policy and procedure.

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