

Social Media Policy

October 2020



Social Media Policy

Policy Agreed	
Document Type:	Corporate Policy
Document Name:	Social Media Policy
Document Location:	Information for Employees / Policies
Effective Date:	August 2020
Review Date:	August 2022
Owner:	Marketing Communications Manager
Consultee:	Human Resources
Approved By:	Council [15 October 2020]
Related Documents:	Code of Conduct for Employees Policy Confidential Reporting Policy Disciplinary Policy [Social Media Strategy] [Social Media Guidance]
Keywords:	Social media, social networking
Equality Impact Assessment in place:	Social Media Policy EIA
Relevant External Law, Regulation, Standards:	Referenced under 5.9 and 7.6

Date	Changes

Contents

	Section	Page number
1.0	Introduction	Page 4
2.0	Purpose	Page 5
3.0	The scope	Page 6
4.0	Responsibility for implementation of the policy	Page 6
5.0	Business use of social media	Page 7
6.0	Member use of social media	Page 8
7.0	Personal use of social media	Page 8
8.0	What happens if it goes wrong?	Page 9
9.0	Breach of policy	Page 10
10	Monitoring and review of this policy	Page 10

1. Introduction

- 1.1. This policy will help employees and elected members to use social media effectively without inadvertently placing themselves in a situation where the appropriateness of their conduct is called into question.
- 1.2. Employees should refer to the council's [Code of Conduct for Employees Policy](#) for specific guidance and expectations relating to behaviour.
- 1.3. Elected members should refer to the council's [Members' Code of Conduct](#), for specific guidance and expectations relating to behaviour.
- 1.4. This social media policy may be amended, withdrawn, suspended or departed from at the discretion of the council at any time.
- 1.5. Whether for business or personal use, employees and elected members should be aware of and comply with the following council policies and guidance when considering any social media activity:

Intranet:

- [Anti-Bullying and Harassment Policy](#)
- [Being Equal Policy](#)
- [Code of Conduct for Employees Policy](#)
- [Confidential Reporting Policy](#)
- [Customer Code Policy](#)
- [Disciplinary Policy](#)
- [Grievance Policy](#)
- [Regulation of Investigatory Powers \(RIPA\) procedural guidance](#)
- [Safeguarding Policy and Procedure](#)

Council website:

- [Data Protection Policy and Privacy](#)
- [Obtaining photographic consent](#)

2. Purpose

- 2.1. Social media is an increasingly popular means of communication that allows people greater freedom in how they express themselves both socially and for business purposes. For many it is now their preferred way of finding out what is going on or contacting organisations like the council.
- 2.2. Engaging with people through social media can give us, as a council, connection and dialogue with residents we may not reach through other channels. We can also gain valuable insight into the issues that affect our borough, which we can use to improve our services and inform our decision-making.
- 2.3. This policy will help employees and elected members to make the right decisions about social media. Even if not actively using it, it is important for everyone to have an understanding of the opportunities, as well as the risks, social media brings.
- 2.4. This policy outlines the standards we expect when employees and elected members engage in social media, whether for business or personal use, and should be read alongside the council's [Social Media Strategy] and [Social Media Guidance] documents.

3. The scope

- 3.1. For the purposes of this policy, social media is any type of online media that allows discussion and interaction as opposed to broadcast only.
- 3.2. There are several types of social media we, as a council, use now or may use in the future and this policy covers all types, for example:
 - Social networking (Facebook, LinkedIn)
 - Microblogging (Twitter, Tumblr)
 - Photo sharing (Instagram, Snapchat, Pinterest)
 - Video sharing (YouTube, Facebook Live, Periscope, Vimeo)
- 3.3. This policy also covers private messages sent over online channels such as direct messaging via Facebook, Twitter and WhatsApp.
- 3.4. This policy applies to third parties employed or acting on behalf of Woking Borough Council including:
 - agency workers
 - casual workers
 - consultants
 - interims engaged from time to time by the council
 - volunteers

4. Responsibility for implementation of the policy

- 4.1. Employees and elected members are responsible for their own compliance with this policy and for ensuring that it is consistently applied to protect the privacy, confidentiality, reputation and interests of the council.
- 4.2. Third parties employed or acting on behalf of the council should be made aware of this policy by those responsible for appointing or managing them.
- 4.3. Concerns about social media use should be referred to the Marketing Communications team, or for more sensitive and/or personal issues, please review the council's [Confidential Reporting Policy](#).

5. Business use of social media

5.1. Generally, the use of social media in a business context is to:

- promote and publicise activities that will enhance the reputation of the council.
- respond to specific questions from the public, businesses and partners.
- clarify or correct any unclear or incorrect statements or views.
- provide information, advice and guidance (particularly in emergency situations).
- initiate and participate in dialogue with the public relating to council services.
- show Woking Borough Council as a human and approachable organisation.

5.2. The Marketing Communications team manages and oversees all business related social media activity for the council. You **must seek approval from the team before** setting up a social media account for a service area or business-related activity.

5.3. If permitted, services must have sufficient resources in place to manage, maintain and grow their social media accounts. This includes responding to questions and feedback within a reasonable time frame.

5.4. Before embarking on using social media for business purposes you should review, understand and comply with the actions set out in the council's [\[Social Media Strategy\]](#) and [\[Social Media Guidance\]](#).

5.5. All information and responses you post for business purposes are public statements and count as a council record. They may be used as reference at any time in the future, including by the media, and you are responsible for anything that you say online.

5.6. You must not use any information that you obtain in the course of your work for the council for personal gain or pass it on to others who may use it in such a way.

5.7. You must not disclose any politically sensitive information. This includes matters that are due to be considered or debated by members, and subject matters which are known to be, or likely to be, politically controversial. If you are in any doubt you should seek advice from the Marketing Communications team.

5.8. Never publish confidential information through social media that you may have learned or have access to as part of your job. This includes personal information about service users, their families or friends or others e.g. contractors, elected members, council employees as well as council related information. This requirement continues after you end your employment with the council.

5.9. You should **never** use social media to 'spy' on service users covertly, even if their privacy settings allow you to do so as this could contravene Article 8 of the Human Rights Act. To make sure you stay within the law you must read the [Regulation of Investigatory Powers \(RIPA\) procedural guidance](#). If you think this is necessary you should get advice from the Legal Services team before taking any action.

6. Elected member use of social media

- 6.1. Elected members are advised to keep their personal and public life separate on social media by setting up separate social media profiles. The Marketing Communications team can assist with this.
- 6.2. To use social media effectively in your official capacity as an elected member of the council, members should refer to the guidance set out in Section 5 of this policy, 'Business use of social media' (page 7).
- 6.3. Whilst scrutiny is a fundamental role of elected members, you should not post or share anything on social media that is false, misleading or you wouldn't feel comfortable saying in a public meeting.
- 6.4. Elected members should refer to the council's [Members' Code of Conduct](#), for specific guidance and expectations relating to behaviour.
- 6.5. Specific information on the use of social media for members is [available on the Local Government Association website](#).

7. Personal use of social media

- 7.1. As the line between what is public and private, personal and professional becomes increasingly blurred, it is important to remember that your personal digital activity could have an adverse impact on your professional/public role or the council's image and reputation.
- 7.2. Even if you do not expressly name the council as your employer on social media, this policy will still apply if a connection can be reasonably made.
- 7.3. Specifically, the council will not tolerate any of the following activity on social media if it can be connected to you as an employee or member of the council:
 - abusive or threatening behaviour
 - inappropriate comments or material that may be regarded as discriminatory
 - false or misleading statements that could have a negative effect on the council's reputation
 - inciting or supporting somebody to commit a crime or other unlawful acts
- 7.4. This could include content you share or like as this could suggest you approve of (endorse) that content.
- 7.5. You must consider carefully whether you accept 'friend requests' from service users, their families, friends or others e.g. contractors. Accept them only if you are sure this will not put you in the position of having a real or apparent conflict of interest.

7.6. As is the case for business use of social media you should never publish anything that is confidential to the council or use social media to comment on potentially sensitive matters, including (but not restricted to) the following:

- information about service users
- information that is politically or commercially sensitive
- any information intended for internal use only (including matters concerning council services, organisational change or related proposals)
- intellectual property

7.7. Do not use council email addresses and other official contact details for setting up personal social media accounts or for communicating through such media.

7.8. Whilst we are encouraging more social media engagement from employees there is still a requirement that employees only use personal social media during office hours on an occasional basis.

7.9. There are some instances when personal and business use crosses over:

- to manage a council Facebook page as these must be administered from a personal Facebook profile.
- to post a specific council message to a closed Facebook group you belong to.
- many council employees are also residents so in some circumstances it may be appropriate to use a personal account to participate in social media activity run by the council such as sharing posts and signalling your interest in council events.

7.10. Do not use personal social media to raise or discuss a complaint or grievance about the council, your manager, colleagues etc. If you have a complaint, please review the council's [Grievance Policy](#).

7.11. If your post is 'politically restricted' these restrictions will also relate to social media. Please review the council's [Politically Restricted Posts Guidelines](#) for further information. A list of [Politically Restricted Posts](#) can be found on Sharepoint.

8. What happens if it goes wrong?

8.1. You should always show respect to others when using social media and ensure that your actions do not have a negative impact on the council's reputation.

8.2. Mistakes happen – if you post something you didn't mean to, or get a message or response wrong, tell your line manager and the Marketing Communications team immediately to agree remedial action and minimise embarrassment and reputational damage.

8.3. Anyone who feels that they have been subject to cyberbullying or offended by material posted or uploaded by a colleague through any digital communication network should inform their line manager who will take advice from HR and investigate the matter as appropriate.

- 8.4. The council regards cyberbullying as seriously as any other form of bullying or harassment. Cyberbullying will not be tolerated and will be regarded as misconduct that could lead to formal action, including dismissal in serious cases, under the council's [Disciplinary Policy](#).
- 8.5. If your online activities are considered to breach the council's social media policy, the council may require you to remove content.
- 8.6. It should also be noted that, although there is not at present a legal definition of cyberbullying within UK law, there are a number of existing laws that can be applied to cases of cyberbullying and online harassment, which could constitute a criminal offence, including:
- The Protection from Harassment Act 1997
 - The Criminal Justice and Public Order Act 1994
 - The Malicious Communications Act 1988
 - The Communications Act 2003 (s.127)
 - The Defamation Act 2013
- 8.7. The council expects managers to support employees when they raise concerns relating to cyberbullying and take care to make an informed evaluation of the severity of the incident.

9. Breach of policy

- 9.1. Breach of this social media policy by council employees may lead to formal action under the council's [Disciplinary Policy](#) up to and including (in serious cases) dismissal.
- 9.2. Breach of this social media policy by members may give rise to a breach of the [Members' Code of Conduct](#).
- 9.3. Business services will be required to delete any unauthorised social media accounts.

10. Monitoring and review of this policy

- 10.1. This policy will be reviewed annually by the Marketing Communications Manager in consultation with Human Resources, Legal Services and ICT team to ensure that it meets legal requirements and reflects good practice.
- 10.2. Employees are invited to comment on this policy and suggest how it might be improved by contacting marketing.communications@woking.gov.uk

Social Council on media policy – adopted by Council on 15 October 2020