

# Draft Social Media Policy

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| <b>Version of Policy</b>         | Version 1  |
| <b>Draft Number:</b>             | 10   |
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| <b>Date Ratified:</b>            |  |
| <b>Effective Date of Policy:</b> |  |
| <b>Review Date:</b>              | 2016   |
| <b>Applicable To:</b>            | All Caerphilly employees except employees directly employed by Schools unless the School Governing Body has adopted the Policy, Workers and Contractors. |
| <b>Equalities Issues:</b>        | All Equalities considerations have been taken into account when drafting this Scheme.  |

The Council's recognised trade unions have been consulted on this Scheme.



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## **INTRODUCTION**

1. Social media is a term for websites or smartphone applications based on user participation and user-generated content.
2. Social media is the term used for online tools, websites and interactive media that enables users to interact with each sharing information etc. It can take many forms for example blogs; wikis; social networks; forums; podcasts; and content communities. This includes social networking sites and other sites that are centred on user interaction e.g. Facebook, Twitter, LinkedIn, You Tube, WhatsApp, Instagram, Snapchat, Flickr, icloud or Dropbox. This is not an exhaustive list. If you are in any doubt as to whether you are able to use a particular site, please check with your Line Manager.
3. Our Code of Conduct refers to the standard of behaviour required by our employees. The same rules that apply to your actions in general, as found in the Code of Conduct, apply to your conduct online.
4. Officers of the Council are free to use social media in their own time, but where officers are identified directly or indirectly as Council employee using social media in a personal capacity it is expected that they behave appropriately. Any inappropriate online activity may lead to formal disciplinary action being taken against you.
5. The lines between public and private lives, personal and professional matters are hazy in online social networks. This guidance covers the responsibilities of employees both inside and outside of work.
6. This Policy must be read in conjunction with all relevant Council policies and procedures, data protection training and all relevant legislation. Copies of all the Council's policies and procedures are available on the HR Support Portal, from HR or your Line Manager. Further information on the use of social media can also be sought from the Information Commissioner (ICO) at <http://ico.org.uk>. Employees, who use Social Media on behalf of the Council, will be provided with detailed guidance on using it in line with the advice published by the ICO. If you do not adhere to the ICO code, it could result in the Council being fined for non-compliance, so it is important that you read the guidance for using social media. A copy of the detailed guidance is attached at Appendix 1. Employees must also check any processes relevant to social media within their Service Area.
7. The Council has a responsibility to ensure that it has a policy in place to investigate the disputed accuracy of posts and remove any posts that are found to be inaccurate or inappropriate on its social media sites.
8. Social media is not an appropriate place to raise concerns; employees should raise these in line with their line manager or the Council's Whistleblowing Policy.

## **WHAT THE POLICY COVERS**

9. The Policy covers employees' use of social media both on behalf of the Council and in their private lives in relation to what they can and cannot say which reflects upon their employment with the Council.

## **DETAIL OF THE POLICY**

### **Using Social Media Outside Work**

10. The personal image you project in social media may adversely reflect on the image of the Council. Therefore you should:

(a) **Show yourself in your best light**

By identifying yourself as a Council employee within a social network, you are now connected to your colleagues, Managers and often residents and the rest of the world. You should ensure that content associated with you is appropriate and does not release any confidential information about your work with the Council. · Make sure that your online activities do not interfere with your work nor could be perceived as having a negative impact on your employment or commitments to the Council and its residents.

(b) **Think Twice**

You should use mature discretion in all personal communications in social media.

When using social media for personal purposes, you must not imply you are speaking for the Council. You must always be mindful of the Council's Code of Conduct and the standards and conduct expected of you as a Local Government employee.

Avoid use of the Council e-mail address, logos or other Council identification. Make it clear that what you say is representative of your personal views only. Where possible, include a standard disclaimer, such as: "Views here are my own and may not represent my employer". Be aware that the things that you post can link you back to being an employee of the Council even if you have not referred to it specifically in your posts.

Be sensible about disclosing your personal details as this may put you at risk. The background information you choose to share about yourself, such as information about your family or personal interests, may be useful in helping establish a relationship between you and your readers, but it is your decision to share this information. By revealing certain details you might be more vulnerable to identity theft. You have a responsibility for safeguarding your social media content and you should check the security settings on your social media forums. Social network profiles are not always as secure as you think they are, check the settings. Even if your privacy settings are turned on you must not discuss anything that could be classed as confidential information with anyone online even if they are a colleague.

Be extremely careful when receiving friend requests on social media forums from service users or family members of service users, students, contractors, etc. Exercise professional judgement when accepting these requests. Relationships with service users, their families, contractors, etc must be declared on a Register of Employees' Interests Form.

Don't forget that you are not allowed to check social media for personal purposes during working time.

Remember that there may be consequences to what you publish.

(c) **Know your obligations**

You must comply with other Council policies when using social media. For example, you must ensure that you do not breach Council confidentiality and information policies. ·

You must be mindful of the Council's confidential information and it must be protected. If you have any queries on this, please contact the Corporate Information Governance Unit.

Avoid being defensive. When you see inaccuracies or damaging information published about the Council seek advice from your Line Manager or the Communications Unit.

Be the first to correct your own mistakes and don't alter previous posts without indicating that you have done so. In a blog, if you choose to modify an earlier post, make it clear that you have done so.

If you leave the Council's employment, the confidentiality requirements of your employment also extend to your use of social media.

**(d) Show respect to all**

You should be respectful of the Council and your fellow employees. Be aware that people are entitled to their views. Derogatory and discriminatory comments are always wrong because of the impact and upset they can cause for colleagues.

Be prepared for a two-way conversation. You must make sure that what you say is fair and factual and avoids unnecessary or unproductive arguments.

**Guidance To Using Social Media For Communication At Work**

11. We encourage open conversation with residents and businesses. We believe in dialogue between employees and between employees and our residents and all other interested parties wherever they are. All Caerphilly Council sites will be instantly recognisable as being owned and managed by Caerphilly County Borough Council. The Council's Communications Unit will advise and support on all aspects of branding to ensure consistency in approach on corporate branding standards.
12. Such dialogue is crucial in our effort to engage with people and to support our values of openness, fairness, flexibility and teamwork. Social media should be used in a way that adds value to the Council's business. For example it is adding value
  - if it helps you, your co-workers, our residents or our partners to perform well and solve problems;
  - if it enhances services, processes and policies;
  - if it creates a sense of community; or
  - if it helps to promote our aims.
13. We expect you to exercise personal responsibility whenever you participate in social media as part of your duties.
14. This includes not breaching anybody's trust and confidentiality. Be sure that you are presenting accurate information and ensure nobody is misled.
15. Each tool and medium has proper and inappropriate uses. While we encourage all employees to join in conversations, it is important to understand what is recommended, expected and required when you discuss Council-related topics. If the conversation is about a work related topic, you are expected to use your Council email address to ensure that other members of the conversation are aware they are responding to a Council employee. This will also prevent any Council information being passed to unsecure private email addresses.

16. Don't use any social media tool without proper consideration. The IT Security and Communications Unit can offer support and advice on the steps to follow and the paperwork to be completed.
17. Caerphilly County Borough Council reserves the right to monitor the use of all electronic devices owned by the Council, and to monitor all Council social media applications as utilised by employees if it has a valid reason for checking. Such monitoring is covered by the Council's Information Technology Security Policy and is permissible under Article 8 of the European Convention on Human Rights and 10 of the Human Rights Act 1998. By using social media on behalf of the Council, you agree to the Council, as your employer, accessing and monitoring your social media activity. The monitoring and accessing of employees' social media applications will be undertaken in line with the Data Protection Act 1998.

### **As A User On Behalf Of The Council**

18. You should:
  - a) Not use any social media tool for Council business unless you have received appropriate training and you have the appropriate permissions to do so.
  - b) Abide by the Code of Conduct in all situations. If you have any uncertainty about publishing something online, and you are unsure if something you want to publish is appropriate, seek advice from your Line Manager and the Council's Communications Unit. If you as an employee are found to have posted something inappropriate, inside or outside work, the disciplinary procedure may be invoked. Examples of inappropriate behaviour are contained in Appendix 2. If in doubt, don't do it!
  - c) Declare yourself. Some bloggers and social media users work anonymously, using pseudonyms. We discourage this in blogs or other forms of online participation that relate to the Council.

We believe in transparency and honesty. If you are talking about your work, you must use your real name, be clear who you are, and identify that you work for the Council.

If you have a vested interest in something you are talking about, ensure you have made this clear. What you publish may be on the Internet indefinitely so consider the content carefully.
  - d) Follow copyright and data protection laws. For the Council's protection as well as your own, it is critical that you stay within the legal framework and be aware that libel, defamation, copyright and data protection laws apply.

Ask permission to publish or report on conversations that were private or internal to the Council. Be aware that content on social media websites may be subject to Freedom of Information Act 2000 requests.
  - e) Add value. Our reputation is made up in a large part by the behaviour of employees and everything you publish reflects on how we are perceived.

When acting on behalf of the Council, handle offensive comments swiftly and with sensitivity. If a conversation turns and becomes offensive in terms of language or sentiment, make sure you inform your audience exactly why you have removed the comment.

A few sentences should do, along the lines of: "This comment was removed because moderators found the content offensive. I will respond to your comments but please respect the views of everybody who comes here."

### **Caerphilly's County Borough Council's Protocol For Social Media Use**

19. If you already use social networks or blogs for personal use and you have indicated in any way that you work here, you should add a disclaimer that states that opinions on this site are your own.
20. If you want to start a social network or blog for Council purposes such as participation, engagement and consultation about the Council, you should tell your Manager and consult with the Communications Unit. This will ensure you gain the necessary information to do so effectively.
21. You must produce a business case including details of:
  - What you wish to communicate or learn and your target audience.
  - Your aims for the social network or blog and why you think a social network or blog is the right platform for communicating your messages.
  - What other channels of communication you will use to support your use of social networks.
  - How many times a day you intend to update/check the social network or blog.
  - Which other officers will have access to edit the social network or blog when you are unable to update it due to sickness/annual leave.
  - How you intend to keep records of the data that you post onto your social media site or blog.
  - Your commitment to updating the social network or blog to clearly state when you no longer work for the authority or handing over the site to the person who takes over your role.
  - Your commitment to reviewing the social network or blog and providing your Manager and the Communications Unit with data to ensure the social network or blog is being used effectively.
  - Content should be reviewed regularly.
22. Remember that if you break the law using social media (for example by posting something defamatory), you may be personally responsible.
23. If a journalist contacts you about posts you've made using social media you should not comment initially and speak to your Line Manager and the Communications Unit before responding.
24. All information you post when using social media on behalf of the Council is subject to the Freedom of Information Act 2000.
25. All information created as part of your job role constitutes a Council record and is evidence of the Council's work, and may be needed for reference by others in future.
26. All information is subject to a retention period, specifying how long it must be kept.
27. You must notify your Line Manager if
  - you feel that you or someone else is subject to abuse by colleagues through use of a social networking site, which has some reference to either parties being engaged by the Council.

- you receive a request for information that has not previously been published as this could be deemed to be a Freedom of Information request and as such should be logged by the Corporate Information Governance Unit.
- you become aware that any information has been shared inappropriately.

This duty to notify your Line Manager (whistleblow i.e. to report illegal improper or unethical matters that you see) is contained within the Council's Whistle blowing Policy. This duty is particularly important where you see something unacceptable in relation to children or vulnerable adults. When making a disclosure under the Council's Whistle blowing Policy, the procedure laid down must be followed prior to the release of any information into the public domain. If the disclosure is not made following the process laid down under the Council's Whistle blowing Policy then you may not be covered by the protection given by the Policy.

### Guidance For Managers

28. Under these guidelines Managers in each area will decide what is appropriate in conjunction with advice and guidance from the Communications Unit. They should not adopt an unnecessarily restrictive approach but be mindful of the potential risks when using social media. If a Manager feels that there has been any potential disciplinary offence committed, they should seek advice and guidance from their HR. As social media pages are classed as personal data, there is a need to be mindful of the Data Protection Act 1998 when storing, accessing and sharing this information. Managers should give thought to whether there is a less intrusive way of obtaining the information prior to accessing an employees' social media pages and must seek relevant advice from HR.
29. Managers should ensure that any special instructions relating to their Service Area are reasonable and explained clearly to employees and that they are understood by all. Managers should also ensure that employees who use social media as part of their job role are trained in its use and are aware of what is and is not appropriate behaviour.
30. Managers should bear in mind concerns about impartiality, confidentiality, conflicts of interest or commercial sensitivity.
31. In some cases individuals may be dealing with matters, which are so sensitive that rules may have to be set on what they can and cannot talk about using social media.
32. Managers should also have a duty to support any employee who is subject to disparaging comments or abuse via social media websites. If you become aware of this you should refer the matter to your HR Business Partner Team and ensure that the employee is provided with the details of the Council's Employee Assistance Programme ([Care First](#)). If you feel that misconduct has taken place, you should refer the matter to your HR Business Partner Team for further advice and guidance on dealing with the incident. If a Manager becomes aware of cyber bullying and does not take any action to deal with it, the Council may be held as being liable so it is important that the matter is treated seriously and appropriately.
33. If a Manager becomes aware of inappropriate use of social media by employees or a complaint about the use of social media, they must first contact their HR Business Partner Team for advice. This may result in the disciplinary procedure being invoked and the Manager undertaking a disciplinary investigation into the employee's alleged activity on social media applications. In any cases of potential disciplinary action, the harm and scale of the harm on the individual or the Council must be considered.
34. Managers must also ensure that they check the Council's Data Protection notification to the ICO's Office (found at [www.ico.org.uk](http://www.ico.org.uk)) to make sure that their Service Area's use of social media is covered.

## **INTERPRETATION OF THE POLICY**

35. In the event of a dispute relating to the interpretation of this policy the Head of Workforce and Organisational Development or the Human Resources Service Manager will make the final decision on interpretation.

## **REVIEW OF THE POLICY**

36. A review of this policy will take place when appropriate. Any amendments will be consulted on with all the relevant parties. However, in the case of amendments relating to legislative requirements, the policy will be amended and reissued.

**JULY 2015**

## CCBC Acceptable Use Policy for Social Media

The Council has a range of social media channels which we invite people to like or follow us on. They provide information on news, events, jobs, leisure, parks and much more for citizens, businesses and visitors.

We also provide alerts and updates on service changes and disruptions, events, publicity campaigns and consultations etc.

Most online communities have their own rules which we will always follow. We reserve the right to remove any contributions that break the rules of the relevant community, or which are not in line with the following general guidelines:

- be civil, tasteful and relevant.
- do not post messages that are unlawful, libellous, harassing, defamatory, abusive, threatening, harmful, obscene, profane, sexually oriented or racially offensive.
- do not swear.
- do not post content copied from elsewhere, for which you do not own the copyright.
- do not post the same message, or very similar messages, more than once (also called "spamming").
- do not publicise your or anyone else's personal information, such as contact details.
- do not advertise products or services.
- do not impersonate someone else.
- the Council reserves the right to restrict or remove any content that is deemed in violation of this social media policy or any applicable law.

### Monitoring Accounts, Responding and Replying

We are embracing new technology and social media platforms as an integral part of our Council communication. We recognise the opportunities that social media can deliver in terms of engaging with our citizens using their preferred communication tools and creating greater two-way conversation and engagement.

We monitor our main CCBC Twitter and Facebook accounts Monday - Friday 9am to 5pm (except Bank holidays and public holidays). If you contact us via these channels during these times we will reply as soon as possible but there could be delays on some requests whilst we investigate, but we will keep you updated. Posts may not immediately appear outside of these hours.

If your query is urgent please contact the Council's Out of Hours emergency number on 01443 875500. You can also get in touch using online forms that can be found on the Council's website – [www.caerphilly.gov.uk](http://www.caerphilly.gov.uk)

### Deleting Posts

Generally, we will not remove posts that are made on our social and digital media channels, however we will consider removing posts or blocking users or accounts that breach the guidelines outlined above, without any explanation.

Equally to maintain the Council's reputation we may moderate comments before they are published to our social media channels or even delete a post should it be inappropriate.

## **Liking, Following, Sharing and Re tweeting**

Please don't be offended if we don't 'Like' or 'Follow' you on social media. This doesn't mean that we are not interested in what you have to say, it's just that the numbers can get too high for us to manage.

We sometimes follow or like people who provide information that is relevant to our work as a local authority (for example central government accounts, local media, and our partners) or those whose information we can pass on for the benefit of many people.

Occasionally, we'll try and lend our support to local and national campaigns. There will also be times we'll need to like or follow an account in order to take part in conversations.

If we like or follow someone, retweet or share their information, it doesn't mean that we endorse them.

We try and share or retweet information that we think will be of interest to our followers, however please don't be offended if we don't retweet something you want us to.

As a trusted organisation, any sharing of information could be seen as endorsement of a particular view, individual or organisation, and it's important that we remain impartial and protect the Council's reputation.

## **Defamation**

Please take care not to make defamatory statements. In law this means a statement that lowers the reputation of a person or organisation in the eyes of a reasonable person. We will therefore take down any statement that could be deemed to be defamatory.

## **Pre-Election Period**

The Council itself, as opposed to its political administration, must be politically neutral in its communications. Therefore, please do not use any of our pages to promote party political messages or other content.

This is a particularly sensitive issue in the run-up to an election - local, general or European - and we need to be mindful of how content may be perceived (regardless of what was intended).

The Council will continue to publish important service announcements using social media but may have to remove any comments that, in its view, may compromise its obligation to maintain political neutrality.

## **Comments, Compliments and Complaints**

If you have a concern about something posted on a page that the Council is responsible for, you should contact the relevant Service Area or contact the Council's Communications Team which can either deal with your issue or identify and contact the profile 'owner'.

We monitor our main CCBC Twitter and Facebook accounts Monday - Friday 9am to 5pm (except Bank holidays and public holidays). If you contact us via these channels during these times we will reply as soon as possible but there could be delays on some requests whilst we investigate, but we will keep you updated.

Please note:

You should not rely on a social media platform itself to raise serious concerns. Not all platforms will be monitored continuously, especially outside normal working hours.

Our responses to replies, comments and direct messages depend on the individual service

Unless stated otherwise the views/comments given on any of our social media sites may not necessarily reflect the views of CCBC.

### **Privacy**

Any details you provide to register with the Council for social media such as Twitter and Facebook will only be used for that purpose. We do not cross reference these details with any other information held by the Council.

## DEFINITIONS OF INAPPROPRIATE BEHAVIOUR

The following actions may constitute inappropriate behaviour but it is by no means exhaustive.

- Using a site/tool for personal gain or to solicit business for personal gain.
- Publishing materials or comments that might be considered inappropriate, offensive, discriminatory or libellous.
- Behaving in a way which is considered to be inappropriate, offensive, discriminatory, libellous or brings the Council into disrepute.
- Publishing materials considered to be defamatory, discriminatory or to the detriment of the council, its partners and/or the public perception of the Council.
- 
- Publishing or disclosing data, which could put the Council or its customers or service users at risk.
- Publishing or disclosing personal information provided to the Council..
- Where there is evidence that an employee has misused social media and networking sites or has behaved inappropriately, disciplinary action may be taken in accordance with the Council's Disciplinary Procedure.