

# LEIGHTON-LINSLADE TOWN COUNCIL SOCIAL MEDIA PROCEDURE

# 1. Our Policy

- 1.1 Social media networks such as Facebook, Twitter, blogs and forums are replacing traditional media and mass communication channels for many people. These tools present opportunities for Leighton Linslade Town Council, including greater engagement with residents, stakeholders and partners, increased efficiencies and improvement of the Council's reputation. However, the increased use of social media also brings challenges.
- 1.2 The Council believe that there is great potential for developing its social media identity through personal use by employees and does not therefore wish to prevent employees from having social media accounts that link them to the Council. However, there is a need for employees to be clear on and adhere to the standards that apply to such use.
- 1.3 The ability for anybody to instantly publish to the world brings with it professional responsibilities that employees need to understand, even if they do not use social networks for work purposes.
- 1.4 This procedure provides a structured approach to using social media both in a professional and a personal capacity and will ensure that the use of social media is effective, lawful and does not compromise council information, computer systems or networks.

# 2. Purpose

- 2.1 To minimise the reputational, legal and governance risks to the Council and its employees arising from use of social media by employees in both personal and professional capacities.
- 2.2 To ensure everyone who engages in social media activity whether personally or professionally, understands the Council's position with regard to this and adheres to the guidelines contained in this document.
- 2.3 To ensure that everyone who is associated with the Council, including employees, contractors, agency workers, and workers on placement understands their responsibilities when using social media and understand the consequences and how to deal with them if inappropriate postings are made. Elected Members are excluded; as the Members Code of Conduct applies.
- 2.4 To ensure that employees know where to obtain advice, support and information on setting up and managing official Council sites. This will ensure a consistent approach is applied across the Council that is focussed on achieving business objectives and improving customer satisfaction.
- 2.5 To advise employees of how the Council will monitor use of social media.
- 2.6 This procedure should be read in conjunction with other Council policies and procedures, specifically:
  - Disciplinary Procedure
  - Code of Conduct for Employees

- Prevention of Bullying & Harassment Procedure
- Mobile Phone/Device Use Agreement
- Email & Internet Policy

#### 3. Scope

- 3.1 This procedure applies to the use of social media by all Leigton Linslade Town Council employees irrespective of the position they hold. It also applies to others including personnel working on placement, agency workers, contractors and partners who use the town council's IT infrastructure or who are involved in the management of social media services or accounts on behalf of the Council. The term 'employee' shall be construed accordingly throughout the rest of this procedure. Elected members are excluded: the Members Code of Conduct applies.
- 3.2 This procedure applies to the use of social media for both business and personal purposes regardless of whether the equipment being used to access social media belongs to the Council or not.
- 3.3 For the purposes of this procedure 'social media' refers to websites and online networks which allow users to interact with one another. Employees should be aware that social media networks are constantly changing and there are many more examples of social media than can be listed within this document. Social media includes but is not limited to:
  - Facebook
  - Twitter
  - YouTube
  - WhatsApp
  - Tumblr
  - Flickr
  - Wiki
  - Blogs
  - LinkedIn and other professional recruitment networks
  - Message boards/forums
  - Comments under news items and online articles

For a fuller explanation of social media, see Appendix 1.

# 4. <u>Employees Responsibilities</u>

- 4.1 All employees should ensure that they read and understand the procedure. Compliance with the procedure is the duty of every employee.
- 4.2 If you find anything posted on a social media site that breaches this procedure or otherwise brings Leighton Linslade Town Council into disrepute you should report it promptly to your line manager.

# 5. Managers Responsibilities

5.1 Managers are responsible for ensuring that their employees, agency workers and contractors working with them are aware of this procedure and act in accordance with its requirements.

# 6. Breaches of Procedure

- 6.1 If any employee is found to have breached this procedure, they may have their work access withdrawn and be subject to the Council's Disciplinary Procedure.
- 6.2 If a criminal offence is considered to have been committed further action may be taken.
- 6.3 Any potential misuse of social media identified should initially be reported to the Town Clerk or Corporate Governance Manager. Dependent upon the content, the social media site's service provider may be informed and/or the Information Commissioner's Office.

# 7. Monitoring

- 7.1 Employees should have no expectation of privacy in relation to personal use of the Leighton Linslade Town Council internet services including access to social media sites. Whenever you use Council IT resources and systems, you give consent to the Council monitoring your activities.
- 7.2 All internet browsing is logged and the use of social media may be monitored to ensure compliance with Council policies, procedures and guidelines and to support security and criminal investigations.
- 7.3 Postings made from a personal social media account may attain a wide readership and will therefore be considered public rather than private. Publically accessible postings may be investigated if there is a suspected breach of this procedure.

# 8 Bullying, harassment or victimisation through social media

- 8.1 If an employee or other user receives any threats, abuse or harassment from members of the public through their use of social media then they must report such incidents to the Town Clerk or Corporate Governance Manager for advice.
- 8.2 If another employee is bullying, harassing or victimising you online you should report it to your manager and follow the process laid out in the Prevention of Bullying and Harassment Procedure.

#### 9. Personal Use of Social Media

- 9.1 Council ICT equipment is provided for business use. However, in accordance with the Email & Internet Policy, employees can access and use the Council's computers or devices, providing that it does not interfere with work and that it does not involve unprofessional or inappropriate content.
- 9.2 The Council understands that employees may wish to use their own computers or devices such as tablets and smartphones to access social media websites whilst they are at work. In line with 9.1 above, employees must limit their use of social media on their own equipment to their own time.
- 9.3 The following standards apply to all Leighton Linslade Town Council employees' using social media in a personal capacity regardless of what equipment is used to access social media or when or where postings are made:

- Employees are personally responsible for everything they post online.
- When making personal postings, employees should not divulge their Council email address.
- Employees must not create a social media account that could be mistaken for an official Leighton Linslade Town Council account, for example using a council logo
- Employees have a duty to protect the Council's interests and should not publish anything that could directly or indirectly damage or compromise its reputation or their own role as a representative of the authority. Discussing the Council, clients, partner organisations, your work or the people you work with on social media should not be considered private, even in a forum with restricted access. It is not the same as having an offline discussion with friends or a one to one email conversation. Social networks are designed to make sharing as easy as possible, so anything that is posted may be circulated to a wider audience and could be brought to the attention of Council colleagues, managers, councillors and customers.
- When sharing content posted by others, employees should be aware that their actions may be seen as giving tacit approval to opinions that could bring the Council into disrepute.
- Employees must not do anything that could be considered discriminatory against, or bullying or harassment of any individual.
- Employees must not speak on the Council's behalf on social media unless authorised to do so.
- Employees must not use social media to discredit or disparage the Council, it's employees or any third party; to harass, bully or unlawfully discriminate against employees, clients or any other third parties; to make false or misleading statements or to impersonate colleagues or third parties.
- Employees must show proper consideration for the privacy of the people they work with.
- Employees should not air grievances about the Council or any of its activities on social media. Complaints should be raised initially via the line manager. If the issue remains unresolved, the normal Grievance Resolution Procedure should be followed. An alternative way of raising an issue is via the Town Council's Whistleblowing Policy if appropriate.
- There are some guidelines sent out in Appendix 2, which may help individuals who use social media in a personal capacity to avoid unintended consequences.
- If you make a mistake and get it wrong, you are encouraged to be open and honest as this gives the best chance of being able to correct or contain the problem. Tell your line manager immediately and consult with them to agree remedial action

- 9.4 You must not allow your professional and personal use of social media sites to become blurred; you need to be mindful of your duties not to:
  - Disclose Council information without authority.
  - Take part in any political or public activity that compromises or might be seen to compromise your impartial service to the Council and its stakeholders.
  - Provide a reference for other individuals on social or professional networking sites as such references, positive and negative, can be attributed to the Council and create legal liability for both the author and the Council.
  - Make derogatory comments about the Council, its policies or procedures.
  - Make derogatory comments about other Council employees, Councillors or stakeholders.
  - Breach copyright check whether a third party's content is protected before it is re-used or reposted.
  - Indicate that comments made on a social network or blog for personal use where you are identified as working at Leighton Linslade Town Council are the views of the Council. It should be clear that such views are your own. You may consider using a disclaimer that states that opinions on the site are your own and do not reflect the views of your employer. Please note that adding a disclaimer does not absolve the user of their responsibilities to comply with this procedure in particular sections 9.3 and 9.4.
- 9.5 Employees will be required to remove postings that are deemed to be in breach of this procedure.

# 10. <u>Social Media Use for Employees Working with Children and/or Vulnerable</u> Adults.

- 10.1 Only use Council approved accounts and equipment to communicate with clients. Do not 'friend' or enter any private online contact with children or adults who use Council services. This includes family members, carers or friends of clients. Friend requests should be politely declined by explaining that it is against Council procedure, which is designed to protect employees and the public from any misunderstandings.
- 10.2 Be responsible for the way you behave, for what you post and for the language you use whether you are communicating via text, email or social media. Remain professional and use your common sense and judgement.
- 10.3 Conduct yourself in a way that does not breach any of the Council's policies, procedures or your professional codes of practice.
- 10.4 Employees should respect the privacy and rights of young people and vulnerable adults they are working with. However, from time to time you may become aware of material or information posted on social media sites, or through other communication channels, which causes concern about the safety of vulnerable users. In these

- circumstances, you have a duty to report these concerns and follow the appropriate safeguarding procedures.
- 10.5 All employees working with children are advised to make themselves familiar with the advice that is available for parents/carers/professionals and for young people about being safe online. This is available via professional bodies and more generally by searching the internet.

# 11 Investigatory use

11.1 It is recognised that social media can be used for investigatory purposes, such as identifying fraud, illegal events etc. It is important that those employees who use social media for these purposes comply with the relevant guidance and legislation.

# 12. <u>Professional Use of Social Media</u>

- 12.1 Professional use is when you use social media for official Town Council business or post in a way that implies that you represent the Town Council.
  - Access to any town council social media platforms or scheduling software may only be granted by a manager, where it is deemed to be essential to that employee's job role.
     Access may be permanent or granted for only a specific period of time, for example the duration of a community event.
  - On setting up access to town council accounts, employees will be advised of their specific log-in details and what level of access has been granted. Access will generally be limited to editing only, with only minimal officers permitted to have administrator or moderator rights.
  - Access may be limited to authorised devices only.
  - Access will be restricted to minimise potential access to personal data (e.g. direct messages) in accordance with data protection legislation.
  - Any content posted on behalf the Town Council may be edited or removed by an administrator if deemed necessary.
- 13. Employees are personally responsible for the content they publish on any form of social media including sites used for official Town Council business. Care should be taken to:
  - Never give out personal details such as home address and telephone numbers of colleagues.
  - Ensure that personal data or sensitive information is handled in line with Town Council policies and the Data Protection Act
  - Respect copyright, fair-use and financial disclosure laws
  - Ensure that they are confident about the nature of the information they publish.
  - Permission must be sought from their line manager if they wish to publish or report on meetings or discussions that are meant to be private or internal to the Town Council
  - Not reference customers, partners or suppliers without their approval
  - Not use insulting, offensive or racist language or engage in any conduct that would not be acceptable in the workplace
  - Publish any content which may be deemed as defamation or discrimination
  - Not attempt to download or install any software applications or executable software from any social media site, unless this has been approved and authorised by your Head of Service who may liaise with our IT provider.

• Edit collaboratively edited websites such as Wikipedia with care and exercise similar care when engaging with chat forums or commenting on articles as posts can be linked back to local authority/government IP addresses.

This list is not exhaustive.

# 14. <u>Legal Implications</u>

- 14.1 Employees should be aware that there are a number of legal implications associated with the inappropriate use of social media. Liability can arise under the laws of:
  - Defamation
  - Copyright
  - Discrimination
  - Contract
  - Human Rights
  - Protection from harassment
  - Criminal justice
  - Data Protection

Violations of this procedure such as breaching the Data Protection Act 1988 could lead to fines being issued and possible criminal or civil action being taken against the Council, the individual(s) involved, or other organisations (for example 3<sup>rd</sup> party contractors).

#### Appendix 1

#### WHAT IS SOCIAL MEDIA?

#### Social networking

Websites where you create a personal profile then chat, discuss and share information with others such as friends and family. Organisations can also create profiles and promote campaigns and events. Example <a href="https://www.facebook.com">www.facebook.com</a>

# **Messaging Apps**

Messaging apps use the internet to send messages, images, audio or video. The service is very similar to text messaging services however, because the internet is used to send messages, the cost of using these apps is significantly less than texting. Example: WhatsApp (free to download app for smartphones).

#### Wikis

These sites enable users to create, edit and share information about a subject or topic. Example: www.wikipedia.org

# **Blogs**

These are internet diaries, sometimes encompassing forums that allow you to give advice, ask questions or comment on what others have said. The content of a blog may vary from the mundane through to highly specialised.

#### **Twitter**

A mechanism for broadcasting short messages; these can include hyperlinks or photos. The broadcasts, known as 'tweets', go only to your 'followers'. Followers are people who have expressed an interest in what you are saying. It is an ideal medium for keeping up to date with the latest news on key topics.

#### Video sharing

Where you upload and share your personal videos with the rest of the web community. Example www.youtube.co.uk

## Photo sharing

You can upload pictures and images to a personal account which can be viewed by web users the world over. Example <a href="https://www.flickr.com">www.flickr.com</a>

# **News aggregation**

News aggregators provide a list of the latest news stories published by users from a range of different websites. Example: www.digg.com

#### Consumer choice

Many sites give you an opportunity to post your views on a product or service and to check what others think before you buy. Example: www.tripadvisor.org

## **Appendix 2**

# <u>Additional Guidance on Personal Use of Social Media</u>

The following guidance should be considered in conjunction with the Social Media Procedure. It is intended to provide extra detail and advice for employees.

- How you behave online can have an impact on you professionally as well as personally.
   Anything that is posted on line including photos, images and video material, could leave you open to scrutiny from the public and people who use services and could affect your own professional reputation and that of the Town Council and could be viewed as misconduct.
- 2. Nothing you say can be 100 per cent deleted so always be sure and double check before you post.
- 3. Be careful how you use emoticons, and other symbols, as their meaning can be considered in the same way as something you have said.
- 4. Social media sites have large numbers of connected users. Make sure you check each site's default settings regularly so that your details are not on public display. To keep your accounts private, choose settings that mean only the people on your 'friends', followers or contacts lists can see your profiles.
- 5. It is advised that as a general measure to protect your personal safety and identity, you should not accept friend requests from people who are not personally known to you.
- 6. Use secure passwords to protect your accounts.
- 7. Familiarise yourself with best practice in relation to online safety. Websites to visit include
  - CEOP <u>www.thinkyouknow.co.uk</u>

- Boombox Be safe on the Web.
- ICO online social-networking
- www.getsafeonline.org
- 8. Be aware that anyone can search for information about you online, just as they do for any product or service. Avoid putting personal information up on your page, for example where you work, live or your phone number. Find out about your "web shadow" search for yourself online and see what comes up.
- 9. It is recommended that you do not post images that could be used to identify your home or family.
- You may wish to ask friends to check before photographs are posted which may cause you embarrassment. When posting your own images, bear in mind the fact that any image can easily be downloaded and manipulated and choose which images you share accordingly.
- 11. What you post will be around for a long time so consider the content carefully and be sensible about disclosing personal details.
- 12. If you need to you can 'block', 'hide' or 'ban' users from your accounts.
- 13. Be wary of people trying to get your details by sending unsolicited invitations, friend requests or applications. If you don't know the person, the best thing to do is ignore the request.