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Isle of Wight Council

SOCIAL MEDIA POLICY

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1 Document Information

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Author:	Jessica Payne, HR Advisor Human Resources, Resources Directorate ✉ jessica.payne@iow.gov.uk ☎ (01983) 821000 ext 8829
Sponsor:	Judy Mason, Senior Lawyer Human Resources, Resources Directorate ✉ judy.mason@iow.gov.uk ☎ (01983) 821000 ext 6338
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V2	September 2017	Three yearly review plus the addition of liking, sharing and or commenting on media platforms.
V3	March 2018	Updated to reflect social media usage historically.

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3 Introduction

3.1 What is social media?

For the purposes of this policy, social media is a type of interactive online media that allows parties to communicate instantly with each other or to share data in a public forum. This includes online social forums such as Twitter, Facebook and LinkedIn. Social media also covers blogs and video and image-sharing websites such as YouTube and Flickr.

Employees should be aware that there are many more examples of social media than can be listed here as this is a constantly changing area. Employees should follow these guidelines in relation to any social media that they use.

Social media is increasingly being used in both every day and professional life. It is important to recognise that this increase in use means a more robust and responsible approach should be applied when using such platforms.

3.2 How the council currently uses social media

- We currently provide breaking news on Facebook and Twitter in addition to the more traditional electronic communications via iwight.com. We also add updates to our social media news pages almost every day. More recently a Team IWC Facebook page has also been created for staff (only) to interact with each other to enhance the communication and interaction with other colleagues. The council also uses social media to;
- Place occasional news videos on YouTube.
- Allow members of the public to respond to our messages, report a problem or ask a question via the social media pages.
- Allow followers of our news stories on iwight.com to share these stories with others via MySpace, GooglePlus, Yahoo, Twitter and Facebook.
- Engage with residents when information of an urgent and often changing nature needs to be publicised. Examples of this have been updates during periods of inclement weather in relation to school and road closures.

3.3 How social media benefits the council and those it serves

Social media is now a major feature in the everyday lives of people and can therefore help the council increase the effectiveness of its communications by engaging far more directly with local residents and the communities we serve and by providing 'real time' information. It also provides a platform to engage residents in aspects of services they are interested in and can help create positive dialogue and interaction across the island.

However, your use of social media can pose risks to the council's confidential and proprietary information, and reputation, and can jeopardise its compliance with legal obligations. It is therefore necessary to ensure there is appropriate guidance available to you in the use of social media as well as a clear set of expectations of what is acceptable and unacceptable use.

For the avoidance of doubt, this policy covers social media usage both in the workplace and outside of work, as well as both historic and current social media content that brings the reputation of the Council in to disrepute. This policy also provides information on the sanctions that could be imposed by failing to adhere to the guidance. It is important that the Council takes a pro-active approach in setting out clear expectations on the use of social media and updates its policies in line with local and national changes.

4 Scope and purpose of the policy

This policy deals with the use of all forms of social media platforms, including but not limited to Facebook, LinkedIn, Twitter, Wikipedia, all other social networking sites, and all other internet postings, including blogs and video/ image-sharing websites such as YouTube and Flickr.

It applies to the use of social media for both business and personal purposes, whether during office hours or otherwise. The policy applies regardless of whether the social media is accessed using the council's ICT facilities and equipment or your personal equipment. The policy applies to the use of social media both historically and presently.

This policy covers everyone, working at all levels and grades, including councillors, directors, officers, employees, consultants, contractors, trainees, home-workers, part-time and fixed-term employees, casual and agency staff and volunteers.

5 Responsible use of social media

The following sections of the policy provide you with a set of expectations together with clear guidelines for using social media responsibly and safely. However, it is important for you to understand that a failure to abide by these expectations may result in action being taken against you which could lead to disciplinary action, up to and including dismissal. Disciplinary action may be taken regardless of whether the breach of these expectations is committed during working hours, and irrespective of whether council equipment or facilities are used for the purpose of committing a breach. Furthermore, jeopardising the reputation of the council as a result of social media use would be grounds for disciplinary action, including content posted in previous council posts or prior to being employed by the council.

Any disciplinary investigations into potential breaches may also require you to allow the council access to your personal social media accounts. It is important for councillors to understand that breaches of this policy may amount to breaches of the [Councillor Code of Conduct](#) which is contained within the council's constitution.

Council wide policies and procedures are available which include; guidelines, rules, regulations, legal requirements, principles, or directions. Social media should never, therefore, be used in a way that breaches any of the council's policies. You are reminded therefore that you are prohibited from using postings on social media that would be in breach of both this policy or, the council's:

- [Electronic Communications Policy](#);
- Obligations with respect to the rules of relevant regulatory bodies;
- Obligations it has relating to confidentiality, which prevents staff and councillors from using important information belonging to the council;
- [Data Protection Policy](#) (for example, never disclose personal information about a colleague, councillor, staff member or member of the public online);
- [Disciplinary rules](#);
- [Employee](#) or [Councillor Code of Conduct](#) (contained within the council's constitution);
- Legal requirements or ethical standards (for example, using social media in a false or misleading way, such as by claiming to be someone other than themselves or by making misleading statements).
- Safeguarding duties and responsibilities for the protection of vulnerable adults and young people

Or as a means to:

- [Harass or bully](#) other staff, councillors or members of the public in any way (including cyber-bullying);
- Discriminate against other staff or any other third party (including potential job applicant's social media platforms).

You may be required to remove internet postings which are deemed to constitute a breach of this policy.

5.1 Policy expectations

The informal nature of social media can mean that it is easy to cause offence. You should keep this in mind before posting content (both personal or professional), and that what is published might be read by line managers, other officers of the council, elected members, future employers and social acquaintances as well as members of the public or service users and may be available for a long period of time. It is important therefore to consider:

- whether the tone of the message is clear - irony and humour for example may not be clear to the recipient;
- whether the tone is respectful to recipients, irrespective of their role and status;
- that particular care is taken with remarks that are, or might appear to be, critical of another person, as these can come across as much stronger than intended and might in some instances be considered defamatory;
- whether, comments, 'likes' or content sharing could be construed or interpreted as personally or professionally offensive to others (irrespective of whether it was written in this way).
- that particular care is taken before posting, 'liking' or sharing content that could be perceived as jeopardising the council (either past, present or in the future)

5.2 Protecting the council's reputation

5.2.1 You must not post disrespectful or offensive statements about:

- the council, including staff, colleagues, senior officers and councillors (this list is not exhaustive);
- the council's clients or service users;
- the council's partner agencies, other affiliates or anyone that has an interest in the council;
- the work that the council undertakes both in its own right or in partnership with external companies/ individuals.

5.2.2 You should also avoid social media communications that might be misconstrued in a way that could damage our business reputation, even indirectly, by not using ambiguous wording or language.

5.2.3 You should, unless publishing in an approved capacity as the council, never give the impression (by actual wording or implication) that you are speaking on behalf of the council. If there is any possibility of doubt you should make it clear that you are posting on your own behalf. You should write in the first person and use a personal email address when communicating via social media.

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- 5.2.4** You should never provide references for other individuals in a professional capacity on personal social or professional networking sites. If you do, people may think that the council has provided these references and this could make you and the council legally liable for any problems that arise in relation to these.
- 5.2.5** You should not post anything related to other staff or service users, clients, partners, or other stakeholders without their written permission. If the information you post is incorrect, or the individuals concerned do not agree with what has been posted then this could also cause you and the council to be drawn into legal proceedings.
- 5.2.6** If you disclose that you work for the council, or as a councillor post in your role as a councillor you should be clear that your views may not represent those of the council. For example, stating, "the views in this posting do not represent the views of the council/my employer" or the name of the council could be removed from personal information. You should also ensure that your profile and any content posted are consistent with the professional image presented to clients and colleagues.
- 5.2.7** You should avoid posting comments about work or other council-related topics unless it is part of your role to do so. Even if it is made clear that views on such topics do not represent those of the council, comments could still damage the council's reputation. It is part of a councillor's role to engage with constituents and the community and it is expected that you may use social media. However, councillors are reminded that if social media is used as part of their role as a councillor and if referring to council business, the [code of conduct](#) applies and you must not bring the council or your role as a councillor into disrepute.

6 Personal use of social media

Use of personal social media by you during working time is never permitted or by means of access using the council's computers, networks and other ICT resources or communication systems. Using personal social media while at work at the same time as working on your work computer not only detracts from what you are required to do at work, it will also increase the chance that something will be posted that could be in breach of the council's policies/legal obligations or releases confidential information to a very large forum in breach of the Data Protection Act. This could result in a fine for the council of up to £500,000.

You will be able to access publicly available information via social media sites. Abuse of this facility will result in access being withdrawn. Access to publish in an official capacity will be restricted unless a business case has been submitted and approved. See section 7 below for further information.

The council operates across the Isle of Wight and carries out a number of activities that will affect you as both an employee and a resident of the Isle of Wight. However, you need to be aware that action you take in terms of comments, 'likes' or sharing publications on Social Media as a resident could bring the council into disrepute, harm public perception or cause reputational damage to the council.

It is therefore, important to recognise that as an employee of the council, you are expected not to publicise your opinion on Facebook (or any other social media platform) that could be seen as negative to others. This includes, but is not limited to, commenting, sharing posts, liking posts, setting up petitions or actively engaging in petitions that could be viewed as negative about the councils' current or prospective activities. This is also applicable to historical social media activity that could cause reputational damage to the council.

7 Business use of social media (this section applies to staff only)

7.1 If your duties require you to speak on behalf of the council in a social media environment this must only be done once a business case (see appendix A) has been submitted to the council's Electronic Content Group, comprising officers from the media, web and ICT development teams. The Electronic Content Group will review business cases and determine whether it is appropriate for a service or individual to create a separate social media account or whether the messages are best conveyed via the council's existing Twitter and Facebook accounts which are administered by the media and web teams. No accounts should be created until the appropriate approval has been granted. In applying for a social media account the following needs to be taken into consideration:

- Is there a justifiable business need to publish information on social media?
- Is there a justifiable need for a new profile/account or is there an existing one that already serves the same audience?
- Is the new profile/account designed to have a short or long term online life?
- Do you have the resources to operate and moderate the profile/account on a regular basis?
- Do you have a plan of what you expect to publish and a forward plan of content?
- Do you know how you will direct people to your social media content?
- How do you plan to ensure information is also published on iwight.com and that you are catering for users who do not access social media?

7.2 If a business case is approved you are reminded that you must comply with any requirements and restrictions imposed with regards to its use as set out in section 5 above and within the spirit of this policy as a whole. It is your responsibility to make sure that all these guidelines and/or expectations are read, understood and followed in the use of social media for business purposes.

7.3 A standard format for email addresses will be used (e.g. service-social@iow.gov.uk) for logins only and username and passwords will be held centrally so that the account can be accessed by the media and web teams if necessary.

7.4 If you are contacted by a member of the public for comments about the council for publication anywhere, in any social media outlet, the enquiry should be directed to the media and web teams and not responded to without written approval.

7.5 Social media tools should be considered as an additional tool to the other available electronic methods of communication by the council. You should make sure that the content of any social media posting is relevant to its purpose and also give consideration to whether it should also be made available on iwight.com. When doing so, the primary address when publishing links should be iwight.com/(service name).

7.6 Writing for social media

Due to the conversational nature of social media your writing style and message content may require a more informal style than would normally be the case. It is important however, to ensure that you are still viewed as a council employee and therefore, when writing, you should consider this before posting anything.

Also remember, due to the space restrictions of some social media, you may be required to impart your message within a limited number of words/characters (Twitter 140 characters, for example).

7.7 Writing for council social media profiles

- The purpose will be to provide or promote some form of information to a specific or general audience.
- The information provided should be clear, accurate and fair - and not misleading.
- Follow the [Plain English Guide](#).
- The media may deem the content of council social media profiles/accounts to be official comment, so take care with any material placed online.
- If posting in response to a comment on a council profile/account, any contribution should be designed to add value in a relevant way and be careful to avoid getting into an argument or inflaming a discussion. If you are unsure of how to respond, contact the media team before responding.
- You should not do anything to jeopardise Isle of Wight Council copyrightable material, confidential information and intellectual property through the use of social media. Further information can be found via the [Employee Code of Conduct](#).
- Avoid misappropriating or infringing the intellectual property of other companies and individuals, which can create liability for the organisation, as well as the individual author.
- Do not use council logos, slogans or other trademarks, or post any of our confidential information without prior written permission from the media team.
- Where appropriate, ensure that you reference sources of particular information (posted or uploaded) and cite them accurately to protect against liability for copyright infringement.
- When linking from your business social media page to any external websites, you should post this disclaimer:

"Any website links provided from this website are provided for convenience purposes only. The Isle of Wight Council accepts no responsibility for the information or opinions expressed within external websites."

7.8 Notices for external users of the council's social media sites

You should be aware that the following advice is given by the council to external users of our social media profiles via a link provided on the profiles themselves. This advice is provided in

addition to the rules of the social media providers themselves, such as Facebook or Twitter (but not limited to). The advice for external users under the prohibited content section below also applies to service areas posting material on their council social media profiles.

7.8.1 External users

- We will try to respond to comments or replies where we can
- Our social media profiles/accounts are not monitored 24 hours a day, seven days a week and therefore, an instant response may not be possible.
- We may not always see information that you post particularly in busy periods of time
- The nature of your comment/question may mean it is difficult to respond swiftly.
- If your query is serious, urgent or involves personal details please get in touch by email with the relevant council department.
- Due to an influx in members, it may not always be possible to comment or 'like' your comments however, please be assured that we value your contribution.
- If we block your account, this may be because you've followed or liked the council purely to promote a product or service, or because you continue to contravene moderation rules.

7.8.2 Moderation guidelines

- Posts on our social media sites will not be moderated before they appear.
- If we become aware of a published post that is in breach of our guidelines then we reserve the right to delete it as we see appropriate.
- Posts with objectionable content will be deleted as opposed to any content being edited out.
- Posts in languages other than English should be avoided as we do not have the facility to moderate these (the council reserves the right to remove such posts).
- If you post a comment which is removed and you do not believe it is in breach of the guidelines, please contact us via www.iwight.com/media
- If you have any questions about these guidelines, please contact us via www.iwight.com/media
- Due to the increased use of Social Media, these guidelines will be updated frequently if required.

7.8.3 Prohibited content

Please ensure you do not post any material that:

- is abusive, obscene, indecent, discriminatory or offensive;

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- is defamatory, harassing or hateful and capable of damaging the reputation of a person or organisation;
 - invades anyone's privacy or impersonates anyone;
 - encourages conduct that may or would constitute a criminal offence, give rise to civil liability or violate any other law;
 - includes personal information of others, such as name, address, place of employment, contact details or professional role;
 - includes inappropriate user names that are vulgar or offensive;
 - is far off-topic (irrelevant posts that devalue debate for other users may be removed);
 - contains irrelevant or excessive links or appears to contain code;
 - constitutes spam, unauthorised advertising or which may solicit such material;
 - contains long, embedded weblinks;
 - contains logos, slogans or other trademarks;
 - includes a writing style or language that is against the council's [Plain English Guide](#);
 - is political or which contains links to overtly political sites (this is especially relevant in pre-election periods);
 - contains confidential information;
 - may breach copyright law or infringe intellectual property.

8 Monitoring

The council reserves the right to monitor, intercept, review and remove activities taking place on social media that are deemed as inappropriate. This monitoring will be undertaken in accordance with the council's [Electronic Communications Policy](#).

There may also be occasions where for example there are safeguarding concerns or complaints made that it will be necessary for temporary access to be granted in order to conduct an appropriate investigation. Such access is to be authorised by the council's monitoring officer.

9 Use of information posted on social media

Social media provides access to a wealth of information both personally and professionally. Some information is displayed in a very open form without any safeguards or barriers in place. People that have chosen to place their information in such an open forum may expect others to see and use that information, including for council purposes. Consideration should always be given therefore, as to whether the use of that personal information would have an unacceptable impact upon their privacy when balanced against the reason(s) for which the council requires the information. If personal information is obtained then it shall be processed in accordance with the Data Protection Act 1998.

However, other information may only be obtained once there has been approval or selection by another person, i.e. if added as a friend or followed on a social media site. You should not seek to use personal information that is not open to the public for any business purposes. You should also not use social media to undertake covert surveillance of another person, employee or member of public. Covert surveillance includes seeking to establish or maintain a relationship with somebody for the purpose of obtaining information relating to that person or another. Please refer to the council's [Covert Surveillance Policy](#) for further information.

10 Appendix A – Business case for use of social media

Please complete the business case below with as much detail as possible. When completed submit to webteam@iow.gov.uk for review by the Electronic Content Group.

<p>Proposal (Include which social media tools you would expect to use; how you plan to engage with users/groups/organisations; include how this ties in with information on other channels eg:iwight.com and non-electronic)</p>	
<p>Target audience (Who are you targeting with this use of social media and how you plan to target them)</p>	
<p>Expected benefits (What are the benefits from doing this and what ways can this be monitored)</p>	
<p>Content plan (Include regular content and also areas where irregular/special content might be relevant)</p>	
<p>Staff who will need access to publish (List all staff who need access to login to publish to this social media project)</p>	
<p>Responsible manager(s)</p>	