



# SOCIAL MEDIA IN EMPLOYMENT POLICY

This document is subject to the standard policy statements

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| Date agreed & |              |
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| Agreed by:    | Full Council |
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| 1.0 | AGREED |      | NEW POLICY        | FULL COUNCIL |
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### **ROLES AND RESPONSIBILITIES**

#### **DIRECTORS AND HEADS OF SERVICE**

Directors and Heads of Service are responsible for ensuring that employees are aware of their responsibilities.

### **MANAGERS**

Managers are responsible for ensuring that employees within their department understand this policy and abide by it.

### **HR DIRECT**

HR Direct are responsible for advising and supporting managers in the application of this policy.

### 1. Introduction

This policy outlines the requirements for the personal use of social media at work. This policy supports other council policies, including:

- The Code of Conduct
- Information Security Policy
- Internet, Email, Telephone and Monitoring Policy

### **Policy**

For the purpose of this policy, social media is a type of interactive online media that allows people to communicate and share information, knowledge, interests and opinions in a public forum.

Communication is a strategic priority for the council, especially during current challenging times of change. In those times of change, there is more need than ever for effective two way communications and for marketing the council's services and activities. This in itself presents the council with many challenges.

The council need to communicate and consult more effectively with residents and key stakeholders. Social Media is one of the most effective ways of delivering on this aim and it forms an important part of the overarching Communications Strategy.

Social media is also an effective way of consulting and engaging with local residents, community groups and associations. Increasing numbers of people are using social media to express their opinions and views, as well as using it as a way to gather intelligence and information on local issues that matter to them. That is why the council must exploit this opportunity to consult and engage, as well as communicate.

This policy identifies the acceptable use of social media and social networking including clear guidelines for employees and aims to assist managers in terms of managing performance when dealing with matters associated with the use of social media.

This policy also aims to ensure that a fair and consistent approach is applied to all employees, Members and volunteers working on behalf of the council. But most of all, it considers the benefits of using social media as part of day to day work, but also highlights some of the pitfalls that need to be considered throughout day to day business. Specific guidance has been drawn up for Members by the Welsh Local Government Association. Please refer to the WLGA Social Media: A Guide for Councillors guidance available from the WLGA website <a href="https://www.wlga.gov.uk">www.wlga.gov.uk</a> for further information.

### 2. What is social media?

Social media is the term commonly given to website, online tools and other Information Communication Technologies (ICT) used to share content, opinions, personal/professional profiles, comments, and links to other media online. The growth of social media brings with it the opportunity to communicate in new ways, and to reach residents who do not engage using traditional communication channels.

Social media includes (but is not limited to):

- Blogs (personal and professional)
- Facebook
- Twitter
- Bebo
- Myspace
- YouTube
- Flickr
- LinkedIn
- Tumblr
- Personal websites
- Reddit
- Wikis
- Podcasts
- Online forums

### The benefits and risks of using social media

There are a number of key benefits to using social media:

- Modern method of communication
- Dissemination of timely messages instantaneously
- Reach a wide audience
- Effective way of communicating
- Consultation tool
- Engagement tool
- The ability to follow/monitor accounts of partner organisations

- Great opportunity to market Denbighshire County Council and its activities
- Promotion of council-run events.
- Ideal forum for communicating messages during an emergency. Re-tweeting messages from other social media accounts.

There are also a number of risks associated to using social media:

- More opportunity for people to criticise the council in an open forum
- Greater risk for the council's reputation through providing forums for discussion and debate
- You have limited control on managing feedback made to your postings.
- People can use social media for negative gossip that could affect the council's reputation.

However, there are a number of issues that need to be considered from a legal, data protection and safeguarding perspective.

#### <u>Legal</u>

There can be legal implications to using social media inappropriately. An organisation or individual maybe liable if they don't follow the relevant legislation. Individuals must be aware of their responsibilities under the laws of defamation, copyright, discrimination, contract, human rights and protection from harassment (this list is not exhaustive), and most importantly, the council's Code of Conduct for employees and Members. The guide produced by the WLGA makes reference to legal implications for Members.

### **Data Protection**

The council must ensure that all of its employees adhere to the Data Protection Act. Employees and Members should ensure that no personal information relating to any individual should be released without their express consent for the council to do so. The strongest, and safest, advice is to avoid using personal information on social media. Once information has been published, it is difficult to retract.

#### Safeguarding children and vulnerable people

Professionals working with the county need to be aware of the safeguarding issues related to using social media. The blurring of boundaries between personal, private and professional information shared on social media sites can place individuals vulnerable to challenge and possible disciplinary action.

Further guidance on safeguarding children and vulnerable people and the use of social media can be found in <u>Safeguarding and Social Media</u>.

# 3. The use of social media in a personal capacity

The council recognises that many employees make use of social media in a personal capacity. While an employee is not acting on behalf of the council, employees must be aware that they can damage the reputation of the council if they are recognised as being one of our employees.

Employees are allowed to say that they work for the council and the council recognise that from time to time that they may wish to discuss elements of their profession/expertise. However, if employees do discuss their work on social media (for example, giving opinions on their specialism or the sector in which the council operates), they should include on their profile a statement along the following lines: "The views I express here are mine alone and do not necessarily reflect the views of my employer."

Any communications that employees make in a personal capacity through social media must not: breach confidentiality, do anything that could be considered as discriminatory, or considered as bullying, victimisation or harassment, bring the council into disrepute or breach copyright.

The personal image you present in social media may reflect poorly on the image of the council. Employees must take the following into consideration when using social media:

- Be aware of council policies and guidelines for using social media and must adhere to the Data Protection Act and other relevant legislation.
- Not engage in activities on the internet that might bring the council into disrepute.
- By identifying themselves as a council employee within a social network, they are now connected to their colleagues, managers, and often residents and the rest of the world. Therefore any content associated with themselves is consistent with their work for the council.
- Use discretion
- Be discrete in all personal communications in social media. When using social media for personal purposes, they must not imply they are speaking for the council. You must make clear that any opinions or statements are your own and not those of the council.
- Avoid use of council email address, logos or other council identification. Make it clear that what they say is representative of their personal views only by using a disclaimer.
- Ensure that posted material does not disclose privileged or confidential information.
- Show respect to all
- Should be respectful of the council and their fellow employees, Members, volunteers and the public. Derogatory comments are always wrong. All employees and councillors must familiarise themselves with the Respect Booklet (available on the intranet), which offers guidance on equality, diversity, and respect.

 Before anything is posted anything on social media – make sure any online activities do not interfere with their job and that it does not impact on services to residents.

The Code of Conduct for employees can be found on the intranet. The Code of Conduct for Members is contained within Part 5 of the council's Constitution and can be found on the intranet.

### **Welsh Language Scheme**

Please bear in mind that official postings made on behalf of Denbighshire must adhere to the council's Welsh Language policy, unless it is a response to a direct comment made to the council by an external individual or organisation. In that instance, the response should be in the language that the comment was made.

### Other points to note

An organisation may be held responsible for something that an employee has written on behalf of the company, therefore it is important to check before quoting statements from other blogs or websites.

# 4. Enforcement of this policy

This policy relies on employees and members acting responsibly and in line with this policy. The employees Code of Conduct (available from the HR Direct on the intranet) and the Members' Code of Conduct provide the foundation for these guidelines for using social media. The same rules that apply to actions in general, as found in the Codes of Conduct, apply also to conduct online.

Any council employee or volunteer who participates in online communication deemed not to be in the best interest of Denbighshire County Council may be subject to disciplinary action. This could include (but is not limited to): posting confidential council information online, or inaccurate, distasteful, or defamatory remarks about the council.

Whilst the council respects the rights of an employee or volunteer to have an opinion, careful consideration must be made to ensure that any remarks do not bring the council into disrepute.

All volunteers working for the council have a duty to adhere to corporate guidelines and policies and this is the position with this policy.

Where you have concerns that colleagues are breaching this policy or the Code of Conduct, we encourage you to raise these concerns under the Whistleblowing procedure.

Councillors must remember that they are subject to the Members' Code of Conduct in respect of duties of confidentiality and a requirement to treat everyone with respect and consideration. If a councillor fails to follow these guidelines, it can lead to an investigation by the Public Services Ombudsman in Wales and possible sanctions, such as suspension or loss of office. Members also have a duty to report any breaches of the code by other Members.

We monitor internet use across the council, and investigate the top users more closely to see the length of time it has been used and the sites accessed. If we discover any inappropriate or excessive use of the internet, the matter will be escalated to the individual's manager or above, and could lead to the individual's internet account being locked down for a period of time and/or a disciplinary investigation.

# 5. Considerations for employees

- Identify yourself in your online communication, giving your name and, where relevant, your role within Denbighshire when you discuss council related matters. Write in the first person, and make it clear that you are speaking for yourself and not on behalf of Denbighshire County Council.
- If you publish content to any website outside of Denbighshire County Council and it has something to do with your work/council services, use a disclaimer such as this: "The postings on this site are my own and don't necessarily represent Denbighshire County Council's plans or opinions."
- Be wary of overusing social media to promote your event/services this can be seen as 'spamming', or unwanted advertising, and can create a negative impression.
- Respect copyright laws (including use of copyrighted images) and be careful not to plagiarise another's work.
- Never post confidential information online. You must not refer to any clients, contractors or partners without their permission.
- Most social media sites require users to agree to terms of service. You are responsible for reading and complying with the terms of service of sites you use.
- Some sites, such as LinkedIn, allow people to "recommend" current or former co-workers. Any references given should be in accordance with Denbighshire County Council References Policy and Procedure. Any character references given must be from a personal perspective, in line with the policy.
- Respect your audience. Don't use ethnic slurs, personal insults, obscenity, or engage in any conduct that would not be acceptable in the council's workplace.
- You must follow the council's Welsh Language Scheme, which clearly states that any public-facing information must be treated as equal and must appear bilingually. The only exception is in an emergency, when information can be issued in English first, with the Welsh to follow as quickly as possible. Information must be identical in both English and Welsh. If you are asked for information via social media, you should respond in the language in which the request was made.

Below are some examples of how social media should not be used:

- Give serious consideration before joining social media groups that have been set up with the sole intention of criticising the authority.
- Bear in mind that joining certain groups could result in a conflict of interest with your day to day work responsibilities in future.
- Social workers and teachers should not have children and young people/ pupils/students in their list of friends or contacts on social media.

## 6. FAQs

### Can we say on our personal social media page that we had a tough day at work?

Yes, but you should not go into any details. You should talk about your personal reasons for your tough day. You should think about how you may be representing yourself as a council employee with your postings.

### Can I use my council e-mail address for social media?

No, you should use your personal e-mail address. If you are representing the council on professional social media sites, you may use your council e-mail address. However, if you identify yourself as a council employee in any online forum, you must make it clear that you are not speaking for the council, and what you say is representative of your individual personal views and opinions and not necessarily the views and opinions of the council.

### Do I always need to be professional in my postings even when I'm not at work? What about free speech?

If you are representing yourself as a council employee, you need to be professional in your postings. The council's policies and procedures still apply when you are representing yourself as a council employee. You may want to consider maintaining both a professional and personal social media page. Just keep in mind that it is advisable to always be professional online, even on your own personal page, as all social media is public.

### Why do I need to be careful with what I post when I have my site locked down so only friends can access it?

Social media sites are public sites. Even though there are privacy controls, you should assume that your postings may be seen by the public. For example, search engines can locate current postings now and in the future, your "friends" can copy your posts and make them available in public and your co-workers may have access to your sites.