



# Social Media Policy and Employee Guidelines

## **EAST RENFREWSHIRE COUNCIL**

### **SOCIAL MEDIA POLICY**

#### **1. Purpose and Scope**

1.1 The use of social media can help support dialogue between the Council and local people, partner agencies and members of the communities it serves. Such dialogue supports the Council's values of ambition, kindness and trust. This policy relates to the use of social media in the work environment and identifies issues for employees when they use social media in their personal life and the possible implications when they identify themselves as a Council employee when they post to social media.

1.2 The purpose of this policy is to:

- Provide clear guidelines to employees on the use of social media for business purposes and in their personal life;
- Set standards of good practice in the use of social media;
- Ensure employees are aware of their responsibility to comply with the law on issues including discrimination, data protection, defamation and copyright; (see 2.3 below for definitions) and
- Assist employees to distinguish between the appropriate use of social media in their work and personal lives.

1.3 This policy does not stop employees using social media in their work or personal life. Instead the policy should provide clarity to all employees in understanding that the behaviours expected for functioning in a digital world are not any different from behaviours that they are expected to demonstrate on a daily basis in other methods of communication, such as face-to-face, email or on the telephone.

It is not the intention of this policy to create any barriers to employees using social media in their personal life but to clarify the implications when they identify themselves as a Council employee and behave in a manner which may bring the Council into disrepute.

1.4 While not covered under the terms of this policy, those employees who hold a politically restricted post should ensure that anything they post online, either in their work or personal life, does not breach the restrictions imposed on them under the Local Government and Housing Act, 1989.

1.5 This policy applies equally to the use of social media via mobile devices including smartphones and tablets

1.6 This policy applies to all employees including temporary employees and also to casual workers. It will apply to any volunteer, contractor or any other individual who has access to the Intranet via the Council infrastructure.

1.7 This policy will also provide guidance on the process of setting up social media accounts for business purposes and best practice for managing social media accounts on behalf of the Council.

#### **2. Definitions**

2.1 The term social media is used to describe on-line technologies and practices that are used to share information, knowledge and opinions. Social media services and tools can involve a

combination of technology and some form of social interaction and can use a variety of different formats, e.g. text, images, video and audio. This creates new opportunities for communications and collaboration along with new responsibilities for individuals. Posted material can, when matched with an identity or photograph, reflect not only on the individual, but also on that individual's employer, clients, colleagues and profession.

2.2 Social media includes the various online technology tools that enable people to communicate easily via the internet to share information and resources. Social media includes but is not limited to; social media sites such as Facebook, LinkedIn, Twitter, Instagram, YouTube or Snapchat;

2.3 There is also legislation which applies in respect of an employee's on-line behaviour:

- Discrimination - An employer may be held vicariously liable for an employee's actions where it constitutes discrimination or harassment. The employee concerned could also face claims that they have used social media in a deliberate, repeated, and hostile manner against another individual.
- Data Protection - Disclosing personal or sensitive data through social media may be considered as a breach of the Data Protection Act.
- Defamation - Making a defamatory comment through social media can result in an individual being sued for libel if the view is taken that the remarks cause harm to another individuals' reputation. It would be viewed the same as publishing a false and damaging report in a newspaper.
- Copyright laws - These are relevant to social media and the Internet, just as they are to other media. This would include copying and pasting an article into a social media post without using a URL link or gaining express permission.

### **3. Policy**

3.1 All Council ICT systems and services are provided as business tools. Employees who have authorised access to the internet at work are allowed reasonable personal use, provided it does not take place during the user's recorded working hours and only where it does not impact on other business users.

3.2 Where employees are allowed access to the internet from a work PC, they should do so reasonably and responsibly. Employees who are granted access to social media sites for work purposes should ensure they have read and fully understand the Council's Acceptable Use Policy and where appropriate abide by any professional code of conduct that applies to their role.

3.3 Where employees bring their own personal mobile devices into the workplace, they must normally limit their use of these devices to official rest breaks, such as lunch-times. Allegations of over usage of personal mobile devices for personal reasons during core business hours may be subject to investigation and possible action in terms of the Council's Disciplinary Procedures.

3.4 All employees are responsible for any information they make available online in a work or personal capacity whether this was posted during work hours, during breaks or when not at work. The Council will consider employees to be responsible and accountable for information contained on their social media accounts, even if that information originated from another source or was posted out with normal working hours. They will also be held responsible and accountable for postings which have been copied by people entitled to access them and sent on to others beyond the control of the original poster.

3.5 This will apply where they are identifiable as a Council employee and the information or images posted are subsequently brought to the Council's attention. By identifiable, this means either through directly referring to themselves as a Council employee or indirectly identifying the Council as their employer through the information they post. Employees therefore must ensure that when engaging in social media activity they abide by the following standards:

3.5.1 Employees must not use social media sites to

- Send or receive information or images online about the Council, its services, facilities, employees, customers or third parties, which may be considered confidential, offensive, defamatory, discriminatory, harassing, illegal, embarrassing, threatening, intimidating or which may incite hatred (e.g. sectarianism). The extent to which such information or images shall be regarded as meeting any of the above descriptions shall be judged in terms of the likelihood of the employee's comments causing harm or distress, the scale of any harm and the implications of such harm, whether physical, psychological, financial, reputational or commercial.
- Send or receive information and/or post comments or images online which may discredit or call the Council into disrepute. This can also include circumstances where comments, while not intended to be derogatory, may, if taken out of context, bring the Council into disrepute. For the avoidance of doubt, the Confidential Reporting policy (whistle-blowing policy) which is part of the Employee Code of Conduct is available for employees to lodge such concerns and for which the grievance procedure would not be appropriate.
- Participate or offer opinions online in regard to current or rumoured legal/commercial activities of the Council, for example, school closure.
- Send, receive or post images/photos of clients, services users or employees in the workplace without explicit consent.
- Discuss work-related issues and complaints in a manner which could cause distress to individuals, damage their own reputation or that of their employer. Any legitimate concerns should be addressed through the appropriate Council policies e.g. Grievance Policy, Bullying and Harassment Policy and/or the Confidential Reporting policy (whistle-blowing policy).
- Use their Council e-mail address to register on a social network unless they are setting up the account for business purposes.

3.6 When using social media for Council business purposes, employees must:

- Get approval from the Communications team prior to setting up any social media accounts
- Provide the Communications team with account passwords and associated email addresses, along with any subsequent password changes
- This may include (but is not limited to) Facebook, LinkedIn, Twitter, Instagram, YouTube or Snapchat
- Undergo training to be approved social media account authors
- Familiarise themselves with this policy

3.7 The Communication team encourages the sharing of Council social media content on personal accounts, so long as your account abides by the standards detailed in 3.5.1. This allows employees to share work they may have participated in with their friends and followers safe in the knowledge that it contains information which has been approved for sharing. It also helps Council content engage with a wider audience.

#### **4. Breach of the policy**

4.1 As with all other forms of communication, there may be circumstances where an employee's behaviour during the use of social media is brought to the attention of the Council. An example of this may be on receipt of a formal complaint or via some form of publicity.

4.2 In the event that the Council becomes aware of an alleged inappropriate use of social media by an employee, it may conduct an investigation into the matter in terms of the Council's Disciplinary procedures.

An inappropriate use of social media would include but is not limited to, the undernoted:

- Abuse or breach of any Council Policy or rule by which employees are bound to comply with in relation to the use of ICT and social media, including those established by the Communications team. Where applicable breach of the Code of Conduct for employees would also apply
- Serious misuse or abuse of Council computer systems and non-compliance with security policies
- Being charged with a serious criminal offence which, in the view of the Council, affects the employee's suitability for continued employment
- Indecent, violent or offensive behaviour, while working on behalf of the Council, including the viewing, downloading and/or circulation of offensive or sexually explicit material
- Harassment, bullying, discrimination, intimidation or victimisation against any individual(s) whilst working on behalf of the Council, or which can be connected to work by bringing the name of the Council into disrepute
- Behaviour during working hours and out with working hours, which brings the name of the Council into disrepute
- Inappropriate disclosures of confidential information. For example information disclosed without the express consent of an individual, or disclosure of Council information to external organisations, which breaches Council policy or legislation, unless covered by "The Public Interest Disclosure Act" or any other Act
- Violation of any intellectual property rights by the copying and/or distribution of other persons work or ideas without appropriate authorisation
- Defamatory comment in relation to any fellow employee, service user, customer or Elected Member

4.3 Some breaches of this policy may be considered to be so serious they are deemed to constitute gross misconduct. In addition, employees should be aware that in the event that such a serious breach occurs the Council will report these to the Police, for example making racial or sectarian comments. Any breaches of professional codes of conduct will be addressed through established procedures.

4.4 Where employees have a complaint or a grievance against either a colleague or the Council in respect of social media they should use the grievance procedures.

#### **5. Non Compliance with Social Media Policy and Guidelines**

Expectations of employee's behaviour when interacting with social media are no different from expectation of their behaviour when dealing with other methods of communication, such as face-to-face or on the telephone.

The Code of Conduct clearly explains that an employee should not do anything which could bring the Council into disrepute and this would apply to the use of social media. The Social Media policy gives several examples of what could be considered as an inappropriate use of social media. In such cases, the Council may conduct an investigation into the matter in terms of the Council's Disciplinary procedures.

## **6. Related policies and procedures**

6.1 This policy should be read in conjunction with other Council policies relating to the standards of behaviour expected from employees. These policies are detailed below, and copies can be obtained from the Intranet or via your line manager:

- Code of Conduct;
- Data Protection Policy
- Bullying and harassment policy
- Equal Opportunities in Service Delivery and Employment Policy;
- Information Security Policy and Acceptable Use Policy; and
- Disciplinary Procedures

## **7. Further Advice and Guidance**

Please refer to Appendix 1 for Guidelines for employees on using social media for personal use. If you require more advice and guidance on the Council's Social Media Policy please contact your line manager. Alternatively advice can be obtained from your HR Business Partner team, the Communications team or by contacting your Trade Union representative.

## **Appendix 1**

### **EMPLOYEE GUIDELINES**

#### **Guidelines for employees on using social media for personal use**

##### **1.1 What is Social Media?**

Social Media includes the various online websites and applications that enable people to create, share and/or exchange information. Social media include, but are not limited to sites such as Facebook, LinkedIn, Twitter, Instagram, YouTube or Snapchat.

##### **1.2 Why do we need Social Media Guidelines for personal use?**

Using social media creates new responsibilities for employers and individuals, as material posted via social media (whether in a work or personal capacity), when matched with an identity, a photograph or a workplace, reflect not only on the individual, but also on that individual's employer, clients, colleagues and profession.

Simply put, if your identity in any form of social media, links you to the Council as an employee, then you need to take care about what you post or associate yourself with. This should also apply when the information posted indirectly identifies the Council through the information that you have posted.

##### **1.3 Using Social Media for Personal Use**

As the use and popularity of social media continues to grow, the lines between what is public and private, personal and professional have blurred. The Council respects their employee's right to personal use of social media out with the workplace but everyone needs to exercise personal responsibility when using social media.

You should be aware that actions in and outside work that affect your work performance, the work of others, or adversely affect the Council's reputation, may become a matter for the Council.

Considering the following points may help avoid any conflict between your personal use of social media and your employment with the Council:

- If you already use social media for personal use and you have indicated in any way that you work for East Renfrewshire Council you should consider that the personal image you project in social media can affect your reputation and the reputation of East Renfrewshire Council. Sounding off about the Council, even on a personal account can be damaging. By identifying yourself as a Council employee within a social network, you are connecting to your colleagues, managers and even Council residents.
- Remember that social media is used for screening by some employers. Anything from checking your LinkedIn page, to make sure your C.V is accurate, to looking at social media sites to determine opinions, views and interests.
- When using social media for personal purposes, you must not imply you are speaking for the Council. Do not use Council e-mail address, Council logos or other Council identification. Make it clear that what you say is representative of your personal views and opinions.
- You must comply with other Council policies when using social media. For example, you should be careful not to breach Council confidentiality and information security or information management policies, or the Council's Code of Conduct. If in doubt, don't post it.



- Don't make the mistake of thinking that everyone linked to your page is actually your "friend"; don't include sensitive personal details like your employer or your address. Your real friends already know, and you should choose carefully who else you give that information to. The same applies to posting information that you wouldn't want your employer to see. Anyone with access to your page can circulate your post elsewhere.
- Be mindful of your privacy settings, if you want the world to see what you are doing and saying, be aware that you could be held accountable for it.
- Remember if you associate yourself with another Facebook user or site you could be linked with postings and contents on that page.
- Racism, sectarianism or other types of discrimination are unlawful and are not acceptable in any context. Putting these comments online effectively puts them in print.
- Follow copyright and data protection laws, as libel, defamation and data protection laws apply to you.
- Use your common sense, social media is a great way of keeping in touch with friends and family, just be sure you enjoy it sensibly.
- Do remember that personal use of social media is just that, personal, so don't post information while at work unless you are on a lunch break. Check the Information Security policies to find out about limited personal use of Council PC's as well.

This document may be out of date if printed