

Appendix 1.2 to Report on the Social Media Protocol for Members and Social Networking Policy for Employees

Social Networking Policy for Employees

1. Introduction

- 1.1 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, blogs; wikis; RSS feeds; social networking sites such as Facebook and LinkedIn; micro blogs such as Twitter; photo sharing sites such as Flickr; and video sharing sites such as YouTube.
- 1.2 The widespread availability and use of social networking applications brings opportunities for the council to better understand, engage and communicate with its customers, partner agencies and the communities it serves.
- 1.3 This Policy supports the council's stated purpose, ambition and values by enabling the organisation to make best use of these technologies and so improve the way it does business. It also sets out a behavioural framework for staff members to ensure that the considerable benefits that accrue from using social media are adequately balanced against our legal responsibilities and the need to safeguard the council's image and reputation.

2. Purpose

- 2.1 The purpose of this policy is to:
 - ensure staff members are aware of their responsibility to comply with good practice and the law for example in relation to data protection, confidentiality, libel, copyright, safeguarding of children and vulnerable adults, harassment and discrimination so that the council is not exposed to legal and governance risks
 - support safer working practice by setting standards of good practice and behaviour in the use of social media
 - ensure the reputation of the council and its staff is not damaged
 - ensure children, young people and vulnerable adults are safeguarded by reducing the risk of positions of trust being abused or misused
 - minimise the risk of misplaced or malicious allegations being made against those who work with vulnerable groups

- ensure users of social networking media are able to clearly identify where information provided via such applications is legitimately representative of the council.
- enable staff members to distinguish between the use of social media in their work and personal lives.
- ensure the use of social media is aligned to the council's corporate communications strategy

3. Scope

- 3.1 This policy applies to all employees (except those based in schools who are covered by their own school's social media policy), apprentices, volunteers, casual and other non-contracted workers such as agency workers and external contractors providing services on behalf of the council. These individuals are collectively referred to as 'staff members' in this policy.
- 3.2 This policy cannot cover all eventualities and therefore staff members should consult their line manager if they are in any way unsure about what is, and isn't, acceptable use of social media.

4. Legal Framework

- 4.1 All individuals working on behalf of the council are bound by a duty of confidentiality to protect the confidential information they have access to during the course of their work. Disclosure of confidential information on social media, or by any other means, is very likely to be a breach of the council's Code of Conduct for Employees and, in certain circumstances, could amount to a breach of contract which may lead to dismissal. It may also be a breach of the general law.
- 4.2 Confidential information includes, but is not limited to:
- Person-identifiable information, e.g. employee or service user records protected by the Data Protection Act 1998
 - Information divulged in the expectation of confidentiality
 - Brighton & Hove City Council business or corporate records containing organisationally or publicly sensitive information i.e. that which would not be disclosable under the Freedom of Information Act 2000.
 - Any commercially sensitive information such as information relating to commercial proposals or current negotiations.
- 4.3 Other laws relating to discrimination, defamation, harassment, safeguarding and copyright will also apply to information posted on social media.
- 4.4 Staff members need to be aware that they will be held personally responsible if they break the law when using social media (for example

by posting something defamatory). The council may also be held liable for the acts of its staff members whilst working for the council.

5. Definition of Social Media

- 5.1 Social media is the term commonly used for websites which allow people to interact with each other in some way by sharing information, opinions, knowledge and interests. Social networking websites such as Facebook, are perhaps the most well known examples of social media but the term also covers other web based services such as blogs, mircoblogs such as *Twitter*, chatrooms, forums, video and audio podcasts, open access online encyclopaedias such as *Wikipedia*, *message boards*, *photo document*, social bookmarking sites such as *del.icio.us* and content sharing sites such as *flickr* and *YouTube*.
- 5.2 This definition of social media is not exhaustive. The internet is a fast moving technology and it is impossible to cover all circumstances or emerging media. However, the principles set out in this policy must be followed irrespective of the medium.
- 5.3 For the purpose of this policy, the term social media also applies to the use of communication technologies such as mobile phones, cameras, PDAs / PSPs or other handheld devices and any other emerging forms of communications technologies.

6. Principles - Social Media Practice

- 6.1 When using social media whether in a business or personal context staff members need to be aware that everything they post online is public, even with the strictest privacy settings. Once something is online, it can be copied and redistributed and it is easy to lose control of it. They should therefore assume that everything they post online will be permanent and will be shared.
- 6.2 Staff also need to be aware that they:
- must keep their personal and professional lives separate and always maintain appropriate professional boundaries
 - are responsible for their own actions and conduct and should avoid behaviour which might be misinterpreted by others or which could put themselves in a position where there is a conflict between their work for the council and their personal interests
 - must use social media in a professional, responsible and respectful way and must comply with the law in their on-line communications
 - must not engage in activities involving social media which might bring the council into disrepute
 - must not represent their personal views as those of the council on any social medium

- must not discuss on social media personal information about service users, their family members, council staff or any other professionals or organisations they interact with as part of their job with the council
- must not name or otherwise identify council staff, service users, former service users or their family members, colleagues etc in social media conversations
- must not use social media or the internet in any way to attack, insult, abuse, harass, defame or otherwise make negative, offensive or discriminatory comments about council staff, service users, their family members, colleagues, other professionals, other organisations, or the council
- must not browse, download, upload or distribute any material that could be considered inappropriate, offensive, defamatory, illegal or discriminatory
- should not blog in haste, particularly in circumstances where their judgement might be impaired; for example if they have consumed alcohol

7. Use of Social Media by the Council

7.1 Social media is widely used to communicate news and information about the council and the organisations it works with to residents, businesses and charities across the city. The main four social media sites it uses are:

- Flickr
- Youtube
- Twitter
- Facebook

7.2 Before a council social media account can be set up, managers must consult the council's Marketing team and submit a project brief outlining how the use of social media would benefit the service, the social networking sites it is proposed to use and how they will be maintained and monitored.

7.3 If approved, managers must submit a design brief for the new site to the Graphic Design team to ensure it complies with the council's corporate branding. The council's Communication team will then set up the new site.

7.4 All new social media sites will be trialled for three months. The council's Communications team will provide an induction session and ongoing support and guidance for those who will be using the site. This is to ensure that the service makes best use of the site and that the council's image and reputation is protected.

7.5 Social media sites not being used efficiently or not providing any benefit for residents will be removed by the Communications team.

Similarly, any site set up without prior approval will be disabled and/or removed. For further information contact the council's Social Media Officer or a member of the Communications team.

8 Guidelines for those authorised to use Council Social Media Sites

8.1 Staff members must not use any social media tool for council business unless they have first received training from the council's Communications team.

8.2 Those authorised to use social media in the workplace for business purposes have a responsibility to use the tools in a professional and responsible manner. In general terms, this means complying with the requirements set out in this Policy, the council's Acceptable Use of ICT Policy and Corporate Communications Protocol.

8.3 However, staff members need to be aware that when using social media for business purposes, they are acting as ambassadors for the council. What they say and post online will directly impact not only on their personal reputation but also on the reputation and image of the council. Therefore they should also ensure that they:

- identify themselves and their role within the council
- ensure any comments are neutral in tone, factual and clear at all times
- do not undermine the integrity or impartiality of Brighton & Hove City Council in anything they write
- do not express personal views and/or advocate a particular position on a subject , especially on issues associated with party-political controversy.
- correct personal mistakes promptly and don't alter previous posts without indicating that they have done so
- don't provoke negative discussions
- respect the views expressed by their audiences and only remove negative or aggressive comments as a last resort
- never become "friends" with those they come into contact with as part of their work for the council in ways which could lead to a conflict of interest or give rise to potential security and privacy issues
- ask and secure express permission before publishing any documents and/or reporting on social media any conversations that are meant to be private, confidential or internal to Brighton & Hove City Council

- don't cite or make reference to colleagues, clients, other third parties etc or post photographs of other people without their express consent
- 8.4 If staff members are in any doubt about what is, and isn't, acceptable to post on a social media site, they are strongly advised not to post it until they have sought advice from their manager.
- 8.5 Staff members need to be aware that the information they post on social media websites and associated documents can be subject to Freedom of Information requests.
- 8.6 Failure to comply with the above may result in social media sites being removed and disciplinary action being taken against those involved (see section 11 "Breaches of the Policy").

9. Guidelines on the Personal Use of Social Media

General

- 9.1 As the use and popularity of social media grows, the line between what is public and private, personal and professional can become blurred.
- 9.2 It is important therefore that staff members are aware that their actions on their personal webspace could have an adverse impact on their professional role and/or on the council's image and reputation.
- 9.3 In the event that a staff member's online activities impacted on the council, this would no longer be a private/personal matter but would become a matter of concern for the council. This would lead to the matter being investigated in accordance with the council's Disciplinary Procedure and could result in disciplinary action being taken against the individual concerned.
- 9.4 Appendix A sets out the guidelines that staff members should follow in order to avoid any potential conflict between their personal use of social media and their role with the council.

Personal Use of Social Media at Work

- 9.5 Personal use of social media sites is permitted at work but must be within the individual's own time i.e. during lunch breaks. Any use *must not* adversely affect business priorities or network performance.
- 9.6 Staff members must not edit open access online encyclopaedias such as *Wikipedia* in a personal capacity at work. This is because the source of the correction will be recorded as the council's IP address and the intervention will, therefore, appear as if it comes from the council itself.

10. Monitoring the Use of Social Media

- 10.1 The council has systems in place to enable it to monitor all discussions and comments made about the council or related subjects on social media sites.
- 10.2 Staff members need to be aware that these tools are used on a daily basis and enable the council to see online conversations on both professional and private profiles that are open to the public.

11. Breaches of the Policy

- 11.1 The council reserves the right to close any social media applications or remove any inappropriate content published by staff members which may adversely affect the reputation of the council or put it at risk of legal action.
- 11.2 Any breach of this policy will be viewed as a serious matter and may lead to the publishing rights of the staff member(s) involved being suspended whilst the matter is investigated.
- 11.3 Any breach will be investigated in line with Brighton & Hove City Council's Disciplinary Procedure and this could result in disciplinary action, including the possibility of dismissal, being taken against the staff member(s) concerned.
- 11.4 Contracted providers of Brighton & Hove City Council services must inform the relevant council's Head of Service immediately of any breaches of this policy so that appropriate action can be taken to protect confidential information and limit the damage to the reputation of the council. Any action against such breaches should be according to the contractors' internal disciplinary procedures.
- 11.5 In the event of a serious breach of the Council's Social Networking Policy amounting to a breach of the law, the council will be obliged to report this to the Police or other external agency as appropriate.

12. Links to other Policies

- 12.1 This policy should be read in conjunction with the following policies:
 - Code of Conduct for Employees
 - Acceptable Use of ICT Policy
 - Data Protection Guidelines
 - Corporate Communications Protocol

Guidelines for Staff Members when using their own Personal Social Media/ Webspaces

1. Be aware of the dangers of putting personal information such as addresses, home and mobile phone numbers, email addresses etc. onto social networking sites.
2. Ensure that you set the privacy levels of your personal sites at the maximum and opt out of public listings on social networking sites to protect your privacy.
3. Keep your passwords confidential, change them often and be careful about what is posted online. It is a good idea to use a separate email address just for social networking so that any other contact details are not disclosed.
4. Do not identify yourself as a staff member of Brighton & Hove City Council or as a service provider for the City Council. This is to prevent information on these sites being linked with the council. Staff may add a disclaimer such as “these are my own views and opinions and not those of my employer”. In general, problems will be avoided if members of staff do not use their personal social media accounts to comment on council services and functions; this will help prevent any blurring of their private and official roles.
5. Taking the steps outlined in paragraphs 1 to 4 will avoid the potential for you to be contacted by service users, their families or friends or other third parties outside of the working environment and will reduce the chances of you becoming a victim of identity theft.
6. When using social media for personal purposes, you must make it clear that what is posted is not representative of the views and opinions of the council. Do not use of the council’s e-mail address, corporate, service or team logos or brands or other council identification on your personal webspaces.
7. Ensure you regularly review your social networking sites to ensure that information available publicly about you is accurate and appropriate. It is also good practice to close old accounts as they may contain information about you. New staff should do this when they join the council.
8. Do not give your personal contact details including details of any blogs or personal social media sites or other websites to service users, their families or friends or other third parties connected to the council e.g. contractors, elected members.

9. You must not establish or seek to establish social contact via any personal social media/other communication technologies with any service users or ex-service users, their families or friends or other third parties connected to the council e.g. contractors, elected members in circumstances suggesting close relationships that are incompatible with the need for appropriate professional independence and detachment.
10. You must consider carefully 'friend requests' from service users, their families or friends or others e.g. contractors, elected members and accept them only if you are quite sure this will not put you in the position of having a real or apparent conflict of interest in relation to the fact that in your working life you are a council employee. For the avoidance of doubt, this policy would not preclude use of media which have a neutral "business registry" type purpose and which do not suggest close association (such as LinkedIn.)
11. You must not use any information that you obtain in the course of your work for the council for personal gain or pass it on to others who may use it in such a way.
12. You must not disclose any politically sensitive information.
13. Never publish confidential information that you may have learned or have access to as part of your job. This includes personal information about service users, their families or friends or others e.g. contractors, elected members, Brighton & Hove City Council staff as well as City Council related information. This requirement continues after you have left employment.
14. Similarly, do not publish photographs, videos or any other types of image of service users and their families or images depicting staff members wearing council uniforms or clothing with council logos or images identifying sensitive council premises (e.g. care homes) on personal webspace.
15. Do not use council email addresses and other official contact details for setting up personal social media accounts or for communicating through such media.
16. Be extremely cautious about inviting work colleagues to be 'friends' in personal social networking sites. Social networking sites blur the line between work and personal lives and this may make it difficult to maintain professional relationships or it may be embarrassing if too much personal information is known in the work place.
17. Do not use personal webspace to raise or discuss a complaint or grievance about the council, your manager, colleagues etc. There are formal procedures in place for progressing these within the council.

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