

SOCIAL MEDIA POLICY

Introduction

Social media is the term used for online tools, websites and interactive media that enable users to interact with each other by sharing information, opinions, knowledge and interests. This policy and guidelines cover social media issues over the internet and by email, smart phones, social networking sites, blogging, and tweeting that are directly work related or through personal use that can be directly or indirectly linked to work.

For the purposes of this policy, the term 'social media' covers sites and applications including but not restricted to Facebook, Twitter, Google+, Vine, Periscope, Instagram, Trip Advisor, Flickr, YouTube, LinkedIn, blogs, discussion forums, wikis and any sites which may emerge after the creation of this policy where Harlow Council could be represented via employee participation.

Harlow Council acknowledges social media as a useful tool however, clear guidelines are needed for the use of social media sites to ensure they are used effectively as part of a wider communications mix and that their use does not expose the Council to security risks, reputational damage or breach the Data Protection Act 1998.

This policy applies to all Council employees including temporary, contract staff and anyone who has access to the Council's network. It also applies to any partner agencies that work on behalf of Harlow Council as well as volunteers from venues such as Pets Corner and the Playhouse.

Officers should also be aware that misconduct arising from the misuse of social media will be treated in the same way as any other form of misconduct and in line with the Council's Disciplinary Procedure. For more information in relation to disciplinary action please see the 'breaches of this policy' section.

Purpose

The purpose of this policy is:

- To establish clear rules on the extent to which staff may use social media
- To inform staff that monitoring is taking place and the reasons for it.

Corporate use of Social Media

This section outlines who is able to use social media on behalf of Harlow Council and how they can use it.

Staff must not set up accounts, groups, pages or profiles, or take part in any social media activity on behalf of their service area. All media activity should go through the Communications Team who consult with CMT/Heads of Service.

In addition to the work that the Communications Team undertake using social media, there will be limited and specific occasions when individual employees will need to use social media to publicise events, to gather market information, or for other specifically agreed purposes. This will normally feature in their job description, be done with the specific prior consent of their Head of Service in consultation with the Communications Officer and the ICT Manager, and using an identity set up specifically to meet the Council's needs.

Staff should not join groups or become friends with someone purely as a way to investigate them. They should only view public content for work purposes during working hours if they are specifically instructed to investigate as part of their normal work duties.

Social media sites are in the public domain and officers must ensure the reliability and be confident of the nature of the information published. Once published, content is almost impossible to control and may be manipulated without consent, used in different contexts, or further distributed.

Staff must not disclose anyone's personal details such as home addresses and telephone numbers. Officers must ensure that any personal or sensitive information is handled in line with the Council's Access to Information Policy.

Officers must not publish or report on meetings which are private or confidential.

Copyright laws still apply online. Placing images or text from a copyrighted source such as extracts from publications or photos without permission is likely to breach copyright. If officers are unsure about publishing anything they must seek permission from the Communications team.

Council social media must not be used for party political purposes or specific party political campaigning purposes as the Council is not permitted to publish material which 'in whole or part appears to affect public support for a political party' (Local Government Act 1986).

Officers must not seek to promote Councillors' social media accounts during the pre-election period (see separate Purdah guidance)

Council officers must not post via social media any inappropriate, abusive, bullying, racist or defamatory messages to members of the public, Councillors or colleagues either in or outside the work environment.

Council officers must be aware of their own safety when placing information on the internet and must not publish information which could leave them vulnerable.

If an officer receives any threats, abuse or harassment from members of the public through their use of social media as part of their work they must report such incidents immediately to their line manager.

This policy is in addition to any professional standards that govern officers' area of work, and in addition to all other Harlow Council policies which officers are expected to comply with.

Personal use of social media

This section outlines the use of use social media outside of work but in relation to Harlow Council.

It's your own personal choice whether or not you choose to participate in any kind of social media activity in your own time – the views and opinions that you express are your own. However, as a Council officer you should be aware that any information which you post about Harlow Council and/or its partners cannot be kept entirely separate from your working life.

Staff must be aware that, where they are identified directly or indirectly as a Council employee, when using social media in a personal capacity it is expected they behave appropriately and in line with Council policies and procedures.

Any inappropriate online activity will not be tolerated by the Council and this applies whether the inappropriate online activity takes place during or outside of working hours and may result in disciplinary action. Please see the 'breaches of this policy' section for further information.

The Council may also be liable for the actions of officers who post comments or content on social media in a private capacity which are closely connected to the work environment.

Officers using social media in a personal or work capacity must be mindful of their professional working role and maintain professional boundaries with children and vulnerable adults at all times.

A work e-mail address must not be used when registering on social media sites for personal use.

There is however clearly an exemption to be made where a member of staff has a legitimate dual role within the Council – for example as an elected trade union official or as a trade union member– and so may express reasonable views contrary to Council policy in that context, for example on a trade union website or blog.

General guidance on using social media for all staff

Employees should not reference or post comments about the Council, their job role, colleagues, or partner organisations.

You should not become involved in 'conversations' in support of or against things that are posted on sites even if done with the best intentions for example trying to defend the Council in a post that has been made by someone else. Refer any comments like this to the communications team who will look into them further.

Other guidance would be:

- Declare somewhere on their page or biography that the views expressed are theirs alone and do not reflect the views of Harlow Council
- Do not bring the Council into disrepute
- Do not reveal any potentially confidential or sensitive information about the Council that they may have come across in their work duties
- Do not use any Council owned images or logos
- Do not create any fake, anonymous or spoof accounts pretending to represent the council
- Do not include contact details or photographs of service users or work colleagues
- Where possible, refrain from accepting service users or ex-service users as 'friends'
- Do not make offensive comments about the Council, Councillors, colleagues or members of the public as this is a disciplinary offence and may lead to disciplinary action.
- Check your online privacy settings so that you can understand who can see the information you publish and who can view your personal information.

Mature discretion should be exercised in all personal communications in a social media environment. Think before you post. If you aren't sure – don't post it.

Breaches of this policy

Harlow Council will act quickly in cases of social media misuse and any offending clip or comment must be removed from the website concerned in order to limit any potential damage. Once instructed, the officer concerned must remove the information immediately. Any refusal or failure to remove the content from the social media site may in itself, amount to an act of gross misconduct for failing to follow a reasonable instruction.

Serious breaches of this policy by Council employees may constitute gross misconduct and may result in dismissal. Breaches of the policy and/or cases of misconduct will be dealt with in line with the Disciplinary Procedure.

The following are some examples of inappropriate online activity that may constitute gross misconduct (this is not an exhaustive list):

- Comments relating to the Council or damaging its reputation or that of its partners.
- Breaching confidentiality.
- Any offensive, defamatory, discriminatory, threatening, harassing, bullying, hateful, racist, sexist or other inappropriate comments on any social network site or blog relating, directly or indirectly, to your employment.
- Posting material which is in any way unlawful, and which does not comply with the equality laws contained within the Equality Act 2010 and associated legislation.
- Gross misconduct may also include conduct that takes place inside or outside work which impacts upon an employee's suitability to do their job or damages the Council's reputation.

- Other violations of this policy, such as breaching the Data Protection Act, could lead to fines being issued and possible criminal or civil action being taken against the Council or the individual(s) involved.

Where inappropriate social media activity raises concerns in relation to safeguarding children this would be managed through the safeguarding policy.

Monitoring

The Communications Team regularly monitor social media activity in relation to Harlow Council and the issues affecting the town. If they find as part of this monitoring any activity that causes concern or breaches this policy they will initially raise it with the Customer and Media Services Manager to investigate further with the relevant service manager.

Equally if through that monitoring, any activity is posted by members of the public that is of a personal or defamatory nature towards staff members of the Council, the Communications Team will request the removal of it through the sites administrators. Harlow Council follows the rules and guidance put in place by the social media sites that it uses and rely on the measures of protection and intervention that they have in place to do this. If necessary, action may be taken against the individual making the post.

Complaints

If an employee has a concern about anything posted on a social media site which the Council has responsibility for, they should contact their manager in the first instance and provide any supporting evidence to enable appropriate action to be taken. A social media platform will not, of itself, raise concerns, and not all may be monitored continuously. Further information can be found on the website.

Useful contacts

If you need advice about using social media in your work, please get in touch with the Communications Team.

There is a page on the website called [‘How we use social media’](#) which advises on how we deal with interactions with customers.

Links

This policy should be read in conjunction with the [Code of Conduct](#) in the Constitution.