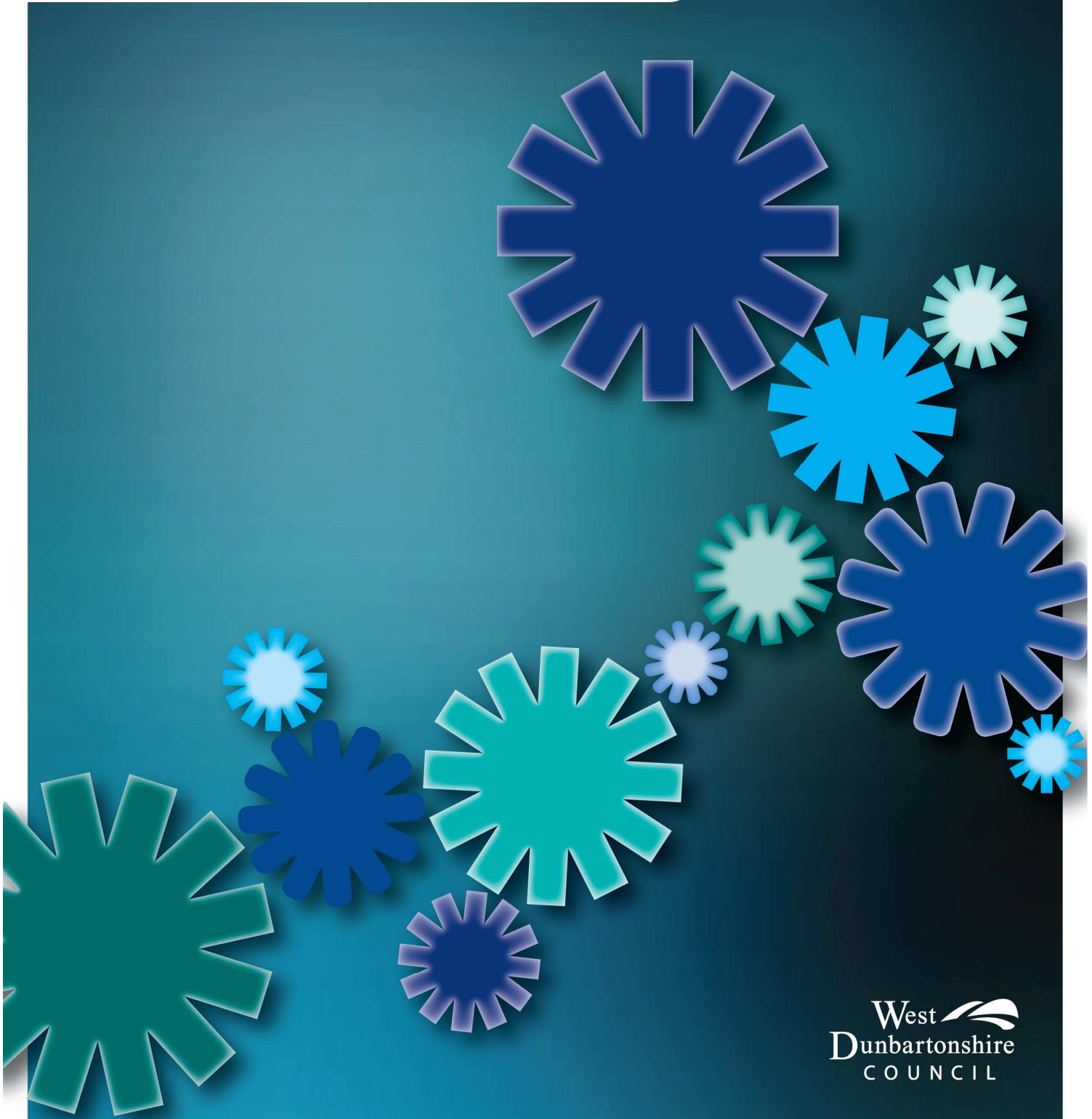


HR EMPLOYMENT POLICY AND PROCEDURES

**Social Media Policy &  
Guidance** Implementation Date: 14<sup>th</sup>  
August 2013



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**PEOPLE & TECHNOLOGY**

**Quick Reference - Associated Documents and Version Control**

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<b>Driver for change</b>	Ensure best practice to protect the organisation and employees in the use of social media applications
<b>Legislative Context</b>	



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## **1. INTRODUCTION**

- 1.1** This policy has been developed to outline the standards of conduct expected of employees when using social media applications, either on behalf of or as an employee of West Dunbartonshire Council (the Council).
- 1.2** The use of social media can help support dialogue between the Council, and its citizens, partner agencies and members of the communities. Such dialogue in the workplace can help the Council to engage with others and help communicate information quickly where an emergency arises, and be an invaluable source of professional information. Consequently, using social media creates new responsibilities for employers and individuals

## **2. SCOPE**

- 2.1** This policy applies to all employees of West Dunbartonshire Council (the Council) including, Local Government Employees, Craft Workers, Teaching Staff, and Chief Officers.
- 2.2** The Council will ensure that good equal opportunities practice underpins the operation of this policy and the policy will apply to all employees irrespective of age; disability; sex; gender re-assignment; race; religion or belief; sexual orientation; marriage and civil partnership; and pregnancy and maternity.

## **3. DEFINITIONS**

- 3.1** Social media is the use of web-based and mobile technologies where users can easily participate in, share and create content. Social Media includes the various online technology tools that enable people to communicate easily via the internet to share information and resources. Social media include, but are not limited to, blogs; wikis; RSS feeds; social networking sites.

## **4. KEY PRINCIPLES**

- 4.1** The purpose of this Policy is to:
- Provide clear guidelines on the expected standards of conduct by employees when using social media.
  - Ensure employees are aware of their responsibility to comply with the expected standards of conduct.
  - Outline to employees the impact that not following the expected standards can have on their employment.

## **5. EXPECTED STANDARDS OF CONDUCT**

### **Employees using Social Media on behalf of West Dunbartonshire Council**

- 5.1** Employees must follow the agreed authorisation procedures and will be subject to management supervision.
- 5.2** Employees must ensure that all passwords and login details are not shared with any other employees, other than those authorised to use them, in line with the Corporate Information and Communication Technology Acceptable Use and Security Policy.

### **Personal use of Social Media**

- 5.3** There are a number of documents which clearly detail the standards of conduct expected from employees which also relate to the use of social media. These documents are detailed below, and copies can be obtained from the intranet or via your line manager:

- Code of Conduct
- Teachers code of conduct on professionalism
- SSSC - Using Social Media
- Equal Opportunities Policy
- Equality & Diversity in Employment policy
- Corporate Information and Communication Technology Acceptable Use and Security Policy.

- 5.4** All employees should be aware that their conduct on social media applications could impact on their employment. This can include disciplinary action for misconduct, including dismissal where this constitutes gross misconduct.
- 5.5** Employees should be aware that where there is a serious breach of the Council's Social Media policy or a serious breach of professional conduct, the Council may be obligated to report this to the Police or other external bodies including the relevant professional body.

## **6. LEGISLATIVE CONTEXT**

- 6.1** All users should be aware that information they share through social media applications are subject to copyright, the common law of confidentiality, Data Protection and Freedom of Information legislation, the Safeguarding of Vulnerable Groups Act 2006 and other appropriate legislation.

## **7. APPLICATION OF POLICY AND PROCEDURE**

- 7.1** The Social Media Employee Guidance have been developed to support this policy and detail the expected standards of conduct.

## **8. RESPONSIBILITIES**

### **8.1 The Council will:**

- Provide clear guidelines on the expected standards of conduct by employees when using social media on behalf of the Council and as an employee of the Council.
- Ensure employees are aware of their responsibility to comply with the expected standards of conduct.
- Outline to employees the impact that not following the expected standards of conduct can have on their employment.
- Make appropriate social media access available to employees as required in their work capacity in line with the Corporate Information and Communication Technology Acceptable Use and Security Policy;

### **8.2 Managers will:**

- Ensure employees are aware of their responsibility in relation to the guidance and any associated procedures or codes of practice.
- Familiarise themselves with the appropriate policies in regard to the use of social media and the standard of conduct expected;
- Outline to employees the impact that not following the expected standards can have on their employment.
- Keep authorised use of social media on behalf of the Council under general review and ensuring access rights are removed where appropriate.
- Authorise the use of social media applications for business purposes and monitoring the content of such applications within their service.

### **8.3 Employees will:**

- Demonstrate expected standards of behaviour in their use of social media;
- Maintain their awareness of the appropriate policies in regard to the use of social media and standards of conduct expected;
- Be aware of the impact that not following the expected standards can have on their employment.

### **8.4 ICT will:**

- Ensure compliance with the Corporate Information and Communication Technology Acceptable Use and Security Policy by authorised users of the Council's social media applications.

## **8.5 Corporate Communications will:**

- Support employees in making effective use of social media for approved Council business.

## **8.6 Human Resources will:**

- Provide guidance, advice and support to managers and employees where necessary.
- Review and monitor the Social Media Policy.

## **9. SOCIAL MEDIA REPORTING PROCEDURE**

- 9.1** The procedure has been developed to support the Social Media Policy and outline how to raise and manage concerns when it is suspected that an employee has breached expected standards of conduct.
- 9.2** Employees should report any concerns as soon as possible using the appropriate reporting route. An employee is not expected to carry out any personal investigations to gather evidence.
- 9.3** An employee should provide as much information about the matter including; the nature of the concern, any relevant background information; the employees involved.
- 9.4** The manager receiving the complaint will take a record of the details. A template for recording concerns is available at Appendix A.
- 9.5** The manager will consider the complaint and follow procedure as specified in the relevant policy. Guidance on the appropriate policy is available from HR.
- 9.6** When an employee does not feel confident about raising a concern with their line manager, or they suspect the concern implicates the Line Manager in some way, the concern can be raised at a more senior level.
- 9.7** Where a concern is in relation to the use of Social Media on behalf of the Council, this should be raised directly with Corporate Communications or ICT.
- 9.8** Employees can also raise concerns with Internal Audit.
- 9.9** An employee will not be penalised in any way, where an allegation is made in good faith. Where a concern is considered to be raised frivolously, maliciously or for personal gain, this will be a disciplinary matter and will be progressed in line with the appropriate disciplinary policy.



## **10. EMPLOYEE GUIDELINES - INTRODUCTION**

### Professional Standards of Conduct

- 10.1** All employees should be aware that their conduct on social media sites can have an impact on their employment
- 10.2** Employees should also be aware of the professional standards expected of them. Many professions will have a code of professionalism and employees should familiarise themselves with the Code of Conduct expected by West Dunbartonshire Council.
- 10.3** Serious breaches of professional conduct will be reported to the relevant professional body who may consider taking further action.

### Personal Liability

- 10.4** Employees with social media accounts are agreeing to information being published on public domain regardless of privacy settings. Employees should be aware that they are legally responsible for anything they write or present online. Once something is posted online the author has to assume that it remains in the public domain forever and that they remain responsible for it.
- 10.5** You should be aware of your association with West Dunbartonshire Council when using social media, including professional networking. If you identify yourself as a West Dunbartonshire Council employee (e.g. on Linked In) you should ensure that your profile and any related content are consistent with how you would wish to present yourself to colleagues and professional contacts.
- 10.6** Even if you do not directly identify yourself as a West Dunbartonshire Council employee when using social media for personal purposes, you should be aware that content you post on social media websites might in some circumstances still be construed as relevant to your employment at West Dunbartonshire Council. For example, updating your work bio on your personal profile page to 'Job title at WDC', however, this is not exhaustive of the types of ways to identify you as an employee on social media platforms.

### Acceptable Use of Council IT Facilities

- 10.7** Employees must ensure that they comply with the Corporate Information and Communication Acceptable Use and Security policy when using Council IT facilities.

## **11. EMPLOYEE GUIDELINES – WHEN USING SOCIAL MEDIA APPLICATIONS ON BEHALF OF WEST DUNBARTONSHIRE COUNCIL**

### Professional Use

**11.1** The Council's reputation is made up in a large part by the behaviour of its employees, and what you publish reflects on how West Dunbartonshire Council is perceived. Social media should be used in a way that adds value to the Council's business. If it helps our employees, our citizens or our partners to do their jobs and solve problems; if it enhances the Council's services, processes and policies; if it creates a sense of community; or if it helps to promote the council's aims and values, then it is adding value.

**11.2** Employees using social media in the workplace have a responsibility to use this in an appropriate manner. Employees who are required to post updates to Social Media sites as part of their job should do so in a professional manner which is consistent with the Council's Code of Conduct and ICT Security Policy.

**11.3** Business use of Social Media sites such as Facebook, Twitter, Flickr etc. will be permitted at the discretion of Corporate Communications, provided a business case can be made, and aligns to our corporate guidelines and our overall communications strategy. Key points are:

- social media should be used as part of the overall communications mix and not as a stand alone activity.
- The Council's website is the pivotal digital channel for on-line services, information and transactions. Any engagement and promotional activity through social media must link to up to date, accessible web pages.
- You must be prepared to commit sufficient time and resources to monitor and update social media sites frequently.
- Use of social media must be carefully managed to minimise risk to systems and information security.

**11.4** Access to use social media at work is restricted by our IT security systems. Permissions are managed by ICT with;

- Any requests to view/read Social Media should be directed to the ICT service desk in the first instance.
- Any requests to create/author/develop Social media sites/pages must be directed via corporate communications in the first instance, the initial point of contact will be [Amanda.Graham@west-dunbarton.gov.uk](mailto:Amanda.Graham@west-dunbarton.gov.uk).

**11.5** Employees should be aware that as well as being personally responsible for anything they post, when acting in the course of their work duties;

Employees should:

- Apply for and be registered on the approved business social media user list held by the communications team and not use any social media tool for Council business unless they have received appropriate training.
- Follow copyright and GDPR/Data Protection laws. For the Council's, as well as the employee's protection, it is critical that employees stay within the legal framework and be aware that libel, defamation, copyright and data protection laws apply.
- Ask permission to publish or report on conversations that you take part in at work.
- Be aware that content on social media websites may be subject to Freedom of Information requests.
- Remember that if they break the law using social media (for example by posting something defamatory), you will be personally responsible. You may also be subject to the Council's Disciplinary Procedure.
- Employees must inform the Communications Team if they have identified information that is inaccurate or could damage the reputation of the Council.
- Be prepared for a two-way conversation. And be aware that people are entitled to their views. You must make sure that what you say is factual and avoid becoming involved in unnecessary or unproductive arguments.

**11.6** If a conversation turns and becomes offensive in terms or language or sentiment, employees should handle this swiftly and with sensitivity, remove the comment and make sure you inform your audience exactly why you have done this. A few sentences should suffice, along the lines of: "This comment was removed because the content was offensive. Comments are welcomed but please respect the views of everyone who comes here."

**11.7** If you make a mistake, be up front about your error and correct it quickly. If you choose to modify an earlier post, make it clear that you have done so.

**11.8** Remember that there are consequences to what you publish. If you are about to publish something that makes you uncomfortable, review the suggestions in this document. If you're still uncertain, discuss it with your manager or with the Communications team.

**11.9** Take extra care when developing the use of social media which is likely to involve or promote the activities of children or young people.

Key points are:

- Check your plans with teachers, parent groups, youth workers
- Get permission from parents or carers before publishing any videos or photographs of young people
- Avoid identifying individuals
- Do not use full names
- Check your pages frequently, delete any appropriate content and deal with any suspicious activity immediately.

## **12. EMPLOYEE GUIDELINES – WHEN USING SOCIAL MEDIA APPLICATIONS AS AN EMPLOYEE OF WEST DUNBARTONSHIRE COUNCIL**

Personal Use

**12.1** The Council respects their employees' rights to personal use of social media out with the workplace. We recognise that our employees have the right to express themselves freely when using Social Media. However, employees should be aware that actions that affect their work performance, the work of others, or adversely affect the Council, may become a matter for the Council. This could result in disciplinary action for misconduct, up to and including dismissal where it constitutes gross misconduct, in accordance with the relevant disciplinary policy.

**12.2** When communicating, posting or agreeing to comments electronically, employees should consider the impact this may have on their employment or their colleagues.

**12.3** Expectations of employee behaviour when interacting with social media are no different from the expectations of their behaviour when using other methods of communication, such as face-to-face or on the telephone.

**12.4** When employees identify themselves as employees of West Dunbartonshire Council they are expected to act in a manner which does not bring the Council into disrepute and act in a way that is consistent with the Council's Code of Conduct, Policies and Values.

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

**12.5** Employees are advised not to:

- Post comments which are bigoted, hateful or that may be considered discriminatory or anything that may be considered as bullying, harassment

or otherwise unacceptable under the terms of the Code of Conduct and Equality and Diversity in Employment policy.

- Post or distribute images, videos or messages that may bring the Council into disrepute for example anything that might be considered indecent, pornographic, obscene or illegal.
- Post or send confidential information which may breach GDPR/Data Protection Act 1998.
- Add clients or pupils as friends on personal social networking sites. Teachers should refer to the General Teaching Council's guidance on Social Media for further information.
- Engage in inappropriate personal communication with young people and/or protected adults in known receipt of services from the Council.
- Post any content which it would be professionally inappropriate for young people and/or protected adults to know or see or accessible to young people and/or protected adults.
- Use the Council's logo on personal web pages.
- Post expressions of anger or abuse against another employee
- Publish untrue statements about another person which could damage their reputation or working relationships.
- Communicate or distribute derogatory or defamatory material about any individual or the Council and its partners.
- Send an offensive email from a home email account to an employee of an important customer.
- Post comments on a personal blog that could seriously damage the council's reputation or derogatory content that identifies fellow colleagues. i.e. using social media as a platform to express concerns over internal grievances and processes, use of language, posting of insensitive remarks that breach Equality and Diversity.
- Post statements that discriminate against or harass, or incite violence or hatred against other persons or groups particularly by reference to their race, religion, belief, gender or sexual orientation and anything relevant and protected by the Equalities Act 2010.
- Claim to represent the views of the Council unless authorised to do so; only those employees who are authorised to communicate with the media may do so.
- Transmit confidential or sensitive information relating to individuals or any aspect of the Council's business over internet, social media sites or via e-mail (other than by Council approved, secure systems for external email)

**12.6** It is recognised that as a citizen, an employee is entitled to express views about the Council. This does not include making use of any information gained through working for the Council. However, in their work capacity, employees should not criticise the Council either through the media, at a public meeting or in any written communication with members of the public.

**12.7** Employees working with young people and/or protected adults must follow the expected standards of conduct with regards to their professional codes of

conduct when using social media. Employees should familiarize themselves with the Code of Conduct expected by West Dunbartonshire Council.

**12.8** Employees should not write or report on conversations, meetings or matters that are meant to be private or internal to West Dunbartonshire Council.

**12.9** Unauthorised disclosure of confidential information could constitute misconduct/gross-misconduct in accordance with the appropriate disciplinary policy.

**12.10** Using the internet to make negative or derogatory comments about West Dunbartonshire Council, its officers or members could also result in disciplinary action and potentially legal action on a collective or individual basis. The council will not accept liability for any actions arising out of your personal use of social networking sites.

**12.11** Trade union representatives have a particular role that is not one shared by other employees of the council as described in provision 10.4 of the council's code of conduct. This recognises their right to engage with the media (including social media) in communicating the views of their trade union, including political statements in relation to the Council and its activities. However, with this additional right, trade union representatives have a responsibility to act in a way which does not breach equality and diversity obligations, and which is respectful of individual employees and elected members.

**12.12** Elected members have separate responsibilities to employees of the council and their use of social media is covered by the Standards Commission Scotland – Councillors' code of conduct. It is an elected member's personal responsibility to comply with these and review regularly.

**12.13** It is advised that any content for social media platforms which can be seen to place the organisation at serious risk for reputational damage i.e. breaching confidentiality by disclosing sensitive/confidential internal information/data, use of language, posting of insensitive remarks that breach Equality and Diversity, posting untrue/allegations about employees/members, should be escalated to the Strategic Lead of People & Technology for resolution in the first instance.

## **13. MONITORING**

**13.1** ICT and Corporate Communications will monitor the use of West Dunbartonshire Council's social media accounts and content.

**13.2** The policy will be reviewed in line with any related new or amendments to legislation as required.



Private and Confidential

Social Media

## Record of Concern

<b>Employee Name (Employee raising the concern)</b>	
<b>Job Title</b>	
<b>Strategic Area</b>	
<b>Phone Number</b>	

Details of concerns Raised	
<b>Date concern raised</b>	

Response	Supporting Evidence
Investigation Approved	
No further Action required	

<b>Line Manager's Signature</b>		<b>Date</b>	
<b>Employee's Signature</b>		<b>Date</b>	