Nottinghamshire County Council

Social Media Guidelines

For Managers and Employees

Introduction

1. These Guidelines for Council employees should be read in conjunction with the Council's **Social Media Strategy** and **Social Media Policy.**

2. The purpose of these Guidelines is to cover the <u>practicalities</u> of using social media in order to uphold this Strategy and Policy. It covers the <u>standards</u> expected in relation to both work-related and personal use of social media.

3. These Guidelines have been developed in line with various best practice and guidance documents published by other local authorities, Local Government Association (LGA), Advisory, Conciliation and Arbitration Service (ACAS), the Government's Cabinet Office, Smart Insights. It takes account of legal and regulatory requirements related to digital and social media.

What is social media?

4. Social media is the term commonly given to online tools, channels and interactive media which allow people to interact with individuals, groups or organisations by sharing information, opinions, knowledge, interests and asking questions or participating in online discussion and conversations.

5. Social media includes a range of channels - such as Facebook, Twitter, LinkedIn, Yammer, Flickr, YouTube, Instagram, blogs and forums – which are gradually replacing traditional media and mass communication methods. These tools present opportunities and challenges for the Council.

Why use social media?

6. There is a clear distinction between using social media for professional (work-related) purposes and for personal use in your own time (whether during breaks whilst at work or in your own time outside of work hours).

7. The Council understands the need to use social media channels to stay connected to and interact with residents, customers and partners – whether as individuals, groups or organisations. Social media is therefore a key method in the Council's **Corporate Communications Strategy**.

8. The ability for anybody with Internet access to instantly publish to the world brings with it professional responsibilities that all council employees need to understand, even if they don't use social networks for work purposes.

9. The following risks are identified with the use of social media:

   - Damage to the Council's reputation
   - Civil or criminal action relating to breaches of legislation
   - Disclosure of confidential information / breach of safeguarding through the use of images or personal data
   - Virus or other malware (malicious software) infection / social engineering attacks (sometimes known as 'phishing')
   - Potential effect on ICT network performance
   - Bullying or witch-hunting
   - Lost productivity as a result of personal use of social media during work time

10. These risks can be effectively managed by upholding the Council's Social Media Policy and following the guidelines set out below.

Responsible use of social media

11. Everyone is responsible for using social media appropriately and need to be aware of a variety of **legal implications** associated with the inappropriate use of social media. This applies whether you are using social media for professional or personal use. Liability can arise under the laws of:

   - Defamation (including Libel)
   - Copyright
   - Discrimination
   - Contract
   - Human Rights
   - Protection from harassment
   - Criminal Justice
   - Data Protection
   - Plus issues of confidentiality and breach of professional standards

12. The particular responsibilities of services and individuals are set out below:

   - Communications and Marketing – maintaining the Council's Social Media Policy, Guidelines and corporate accounts
   - ICT – monitoring usage of social media, access to inappropriate content and reporting any abuse
   - HR – advising and supporting managers in upholding performance and conduct related to individuals' social media use
   - Employees - for your own actions (including compliance with the Council's Social Media Policy); reporting any misuse and raising any potential issues promptly with your line manager; and seeking advice if you are unsure about the application of any part of the Social Media Policy or Guidelines
   - Managers - ensuring that your employees are aware of the Council's Social Media Policy and these Guidelines (including through induction and regular discussion in supervision and team meetings) and act in accordance with these requirements.

13. If any employee is found to have breached the Social Media Policy they may be subject to the Council's disciplinary procedure.

Monitoring

14. All Council ICT systems can be monitored in accordance with ICT Policies including the Email and Internet Policy, so personal privacy cannot be assumed when using the Council's network.

15. Postings made on a personal account may attain a wide readership and will therefore be considered public rather than private. In particular if an association with the Council is referenced or mention of the Council's name or services is referenced. Publically accessible postings may be investigated if there is a suspected breach of the Social Media Policy.

The difference between 'professional' and 'personal' use

16. Access to social media channels within the workplace is granted to Council employees via the Council's network. This is to enable you to:

- Understand the issues, queries and concerns that are raised by residents, service users and stakeholders via social media
- Access training materials, build professional networks and advocate (as appropriate) the work of the Council

17. Council ICT equipment is primarily reserved for work-related use of social media. Employees are permitted to use Council approved social media channels as part of their normal work duties with agreement from the employee's line manager.

18. During normal working hours, employees are permitted to access and use social media via Council ICT equipment in your own time (e.g. in break periods), providing it does not interfere with your work.

19. Outside of normal working hours, the use of Council ICT equipment for personal use must comply with the Corporate Information Security Policy and only take place with prior approval from your line manager.

20. The Council recognises that many employees will also use personal devices (e.g. personal smartphones and tablets) for personal use of social media during break times in working hours.

21. The following applies to all employees regardless of whether Council or personal equipment is used or when social media is accessed or postings are made:

- **Any views stated are personal views**
- **Ultimately, you must comply with your responsibilities under the Council's [Code of Conduct](#) and may be required to remove social media postings that are deemed to be in breach of this policy**
- Discussing the Council, your work, clients, partner organisations or the people you work with on social networks should not be considered private, even in a forum with restricted access (such as on someone's Facebook wall). It is not the same as having an offline discussion among friends or a one-to-one email conversation. Social networks are designed to make sharing as easy as possible, so anything you say may be circulated to a wider audience and could be brought to the attention of Council colleagues, managers, Councillors and customers
- You are personally responsible for anything you post online
- You should not do or say anything that may harm the reputation of the Council or undermine your role as a representative of the Council
- You should show proper consideration for the privacy of the people you work with
- You should not allow your professional and personal use of social media sites to become blurred and therefore need to be mindful of your duties not to:
    - Disclose Council information without authority
    - Take part in any political or public activity which compromises or might be seen to compromise your impartial service to the Council and its stakeholders
    - Make derogatory comments about the Council, its policies or procedures
    - Make derogatory comments about other Council employees, customers, Councillors or stakeholders
    - Continue to engage with others who become abusive or aggressive.

22. You may wish to identify yourself as a Council employee and contribute to a conversation on social media to inform customers or protect the Council's reputation. Whilst the Council encourages this use of social media it falls under professional use, so you should first read the guidance in Section A below.

Section A – Professional use of social media

Context

23. 'Professional' or work-related use is when you use social media for official Council business or post in a way that implies that you represent the Council. This includes:

- Publishing information via a Council-owned account
- Posting in your role as an employee of the Council
- Posting as an official spokesperson for the Council.

24. Appropriate professional use of social media is encouraged but you should familiarise yourself with the guidance below before posting.

Specific guidance on professional use

25. Follow the following general good practice tips:

- Ensure Council social media accounts remain secure (e.g. follow normal data security and do not share passwords)
- You should normally use Council provided equipment
- Be honest, courteous and professional at all time
- Avoid arguments, be positive and add something significant to the conversation
- Only post facts that you are sure of and don't do or say anything illegal
- Remain politically neutral
- Understand the situation and audience before you post
- Tell colleagues before you post if something you say may affect them
- Get permission before you republish copyrighted material
- Don't share confidential or sensitive information, even in private forums
- How you deal with a complaint is as important as the complaint itself
- Nothing you say can be 100% deleted, so always be sure before you post
- Journalists may quote you so be mindful of the Council's Media Protocol (seek advice from the Council's Communications and Marketing service as needed).

26. If you are in any doubt, contact your line manager and the Communications and Marketing service for advice before posting.

27. If you are threatened with legal action for something you have posted - remove the posting immediately and notify your line manager who must notify the Communications and Marketing service and consult Legal Services (if your line manager is not available you will need to notify these services).

Employees working with children and vulnerable adults

28. You should follow any service protocols as appropriate which relate to your role and any guidance published by regulatory bodies, for example the Health Care Professions Council (HCPC) or Ofsted.

29. Only use Council approved accounts and equipment to communicate with clients. Do not "friend" or enter into any private online contact with children or adults who are clients (or any of their family members). Friend requests should be politely declined by explaining that it is against Council policy, which is designed to protect staff and the public from any misunderstandings.

30. Be responsible for the way you behave, for what you post and for the language you use whether you are communicating by text, email or social media. Remain professional.

31. Conduct yourself in a way that does not breach any of the Council's policies including the Employee Code of Conduct or your professional codes of practice.

32. How you behave online can have an impact on you professionally as well as personally. Anything that is posted online including photos, images and video material, could leave you open to scrutiny from the public and people who use services and could affect your own professional reputation and that of the Council and could be viewed as misconduct.

33. Employees should respect the privacy and rights of young people and vulnerable adults they are working with. However, from time to time, you may become aware of material or information posted on social media sites or through other communication channels, which causes concern about the safety of vulnerable users. In these circumstances you have a duty to report these concerns and follow the appropriate safeguarding procedures.

34. Where a child or young person is in care or a care leaver, it is particularly important to inform the relevant Social Worker/Personal Advisor about anything of concern or any inappropriate information shared online.

35. Follow the following good practice tips:

- Use and regularly check your personal security settings. To keep your accounts private, choose settings that mean only the people on your "friends", followers or contacts lists can see your profiles
- It is advised that as a general measure to protect your personal safety and identity, you should not accept friend requests from people who are not personally known to you
- Be aware also that anyone can search for information about you online, just as they do for any service or product
- Avoid putting personal information up on your page e.g. where you work, live, your phone number and you may choose not to post images which identify your home or family
- You may wish to ask friends to check before photographs are posted which may cause you embarrassment.

36. All staff working with young people are advised to make themselves familiar with the advice that is available for parents/carers/professionals and for young people about being safe online, including:

- The National Crime Agency's CEOP (Child Exploitation and Online Protection Centre) website www.thinkyouknow.co.uk
- National Society for the Prevention of Cruelty to Children website www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/
- The UK Safer Internet website www.saferinternet.org.uk

Contributions using a personal account

37. In your personal or professional use of the Internet, you may come across opportunities to identify yourself as an employee of Nottinghamshire County Council and contribute positively to a discussion or otherwise publish something online.

38. In these situations, you are representing both the Council and yourself and the following guidance should be observed.

39. Be clear about whether what you are saying is your own personal view or represents official Council policy. You may wish to state your views stated are personal.

40. Think through the reason for participating before posting. Stick to your area of expertise. Good reasons for getting involved include: to help people using your professional knowledge, to correct misinformation or to direct people to useful information. Poor reasons for getting involved include: to respond to comments clearly intended to provoke a response (known as "trolling"), participating in arguments or political debates. If you are in any doubt, talk it through with your manager first.

41. Be up front about who you work for and your role in the Council. Be aware that, once you identify yourself as a Council spokesperson, the rest of your postings under the same account may be scrutinised. This includes your profile details, any photo you may have submitted etc. Ensure that your history on that account will not bring the Council into disrepute.

42. You can of course simply notify the Communications and Marketing service about a discussion concerning the Council without getting involved yourself. Contact the Digital Team if:

- You are in any doubt about a contribution you are about to make
- The situation turns negative and you need advice on how to proceed
- Your contribution results in a tangible positive outcome (e.g. a satisfied customer who says as much).

Council owned social network accounts

43. This section covers the setting up and use of social media accounts that are directly associated with the Council.

44. The Communications and Marketing service (Digital Team) must agree and approve all accounts and pages that represent the Council or its services. All corporate accounts will be accessed and monitored by this service.

45. Use of social media should align with business objectives and form part of a wider communications and marketing strategy for your service.

46. The Digital Team will provide advice as to whether use of social media is appropriate in any given instance and, if so, in what form. This advice must be followed in order to uphold the Council's Social Media Policy.

47. The following will be observed in line with good practice:

- All social media will be managed through a social media management tool – training will be provided
- Every account or page should have a primary contact who is responsible for administration
- To provide cover when the primary contact is not available, trusted colleagues can also be provided with log in details
- Everyone with log in details to Council affiliated accounts must be known to the Digital Team
- Keep account log in details secure and never email passwords
- Accounts and pages should normally use Nottinghamshire County Council branding (unless a business exception is granted as per the provisions in the Council's Brand Guidelines)
- User comments that breach the Rules of Engagement (see the Rules of Engagement section below) must be addressed as soon as possible and ideally within 24 hours
- You should check your account at least once a day in case anything urgent arises – thought therefore needs to be given to how weekends/out of hours may need to be covered
- Ensure everything you post is accurate and conveyed in plain English

- Be prepared to respond in a timely fashion to feedback. Direct questions should be answered. If it takes time to prepare an answer, publish a 'holding' message to show that you're listening
- On the other hand, too much engagement can draw accusations of "wasting taxpayer's money" so be concise. Avoid protracted discussions and don't be drawn away from the topic at hand
- How much personal information you disclose (e.g. your real name) is up to you but refer to the rest of this Guidance document for further information about personal identification on social media
- Never use official accounts to post personal opinions that could bring the Council into disrepute or which conflict with official Council policy.

Requests for a new social media account, page or other online presence

48. Use of social media should align with business objectives and form part of a wider communications and marketing strategy for your service.

49. Know what you want to achieve before you start. Plan how you will evaluate the success or otherwise of any social media activity. Make sure you understand the potential time investment involved in building and maintaining online communities/relationships takes time and effort.

50. All requests for new accounts must come through the Communications and Marketing service. You can email econtent@nottscc.gov.uk to start the process.

51. Requests will be assessed on a business case base, so you will be asked to fill in a Request Form which will ask you to consider things like: Objectives, Audience, Content and resource plan, Lifespan of account, Accessibility and provision for those unable to access social media.

Running an online community

52. When you set up a Council affiliated group, page or discussion forum, you are responsible for administering and moderating user contributions.

53. You role is to encourage discussion, set user expectations, create and follow the rules, check the content of everything posted and respond to feedback.

54. As the administrator of an online community, you should follow these basic guidelines:

- Make sure you publish the Rules of Engagement (see below paragraph 78) in a prominent place.
- Apply the rules fairly and consistently.
- Respond to questions and feedback quickly. Social networks move quickly, and a delay of more than 48 hours could cause frustration.
- Make sure you have time to proactively encourage participation. The biggest threat to online communities is a lack of activity.

Rules of Engagement

55. Any group, page, forum or other Council affiliated online presence that allows users to post must make available clear rules for participation. These will allow you to moderate (i.e. edit, delete, warn or ban) submissions and participants fairly. They let users know what is and isn't acceptable up front, which could save you a lot of time and hassle.

56. The wording for 'rules of engagement' should be made clearly accessible to visitors. You may wish to adapt them to your specific use (for example, if young people or vulnerable adults are involved).

57. The following wording is recommended as best practice for 'Rules of Engagement': *The views expressed by members of the public do not represent the views of and are not endorsed by Nottinghamshire County Council. The Council reserves the right to remove any contributions that are not civil, tasteful and relevant or messages which are unlawful, harassing, defamatory, abusive, threatening, harmful, obscene, profane, sexually oriented or racially offensive.*

58. If your online group or community is hosted on a third-party site (such as Facebook or Twitter), you should make sure that your community's rules don't contradict the hosting website's rules.

59. Some general don'ts:

- Do not swear
- Do not post content for which you do not own the copyright
- Do not post the same message, or very similar messages, more than once (also called "spamming")
- Do not publicise other people's personal information, such as contact details
- Do not advertise non-County Council products or services
- Do not impersonate someone else

60. Please note that comments that are critical of the Council can be deemed to be appropriate content unless they breach the above rules. Seek to address any criticisms or complaints quickly and fairly.

Closing down accounts and pages

61. Sometimes groups, pages and accounts are not run in an efficient way, are no longer appropriate or needed, or just don't attract the following they need to remain viable. Leaving dormant or poorly visited accounts online can cause confusion and doesn't reflect well on the organisation. Council accounts will be managed proactively to avoid any such poor social media presence.

62. The Communications and Marketing service (Digital Team) will monitor activity on Council owned accounts and have the right to remove them from the public domain if they seem to have run their course. The owner of the account will be contacted first.

Section B - Personal use of social media

Context

63. Every day people talk online about Nottinghamshire and Nottinghamshire County Council. As a Council colleague you are an ambassador for the authority, whether out in the community, dealing with our customers as part of your work, or indeed when making use of Council services for yourself.

64. Many colleagues will already be active users of social media channels such as Facebook and Twitter on a personal basis outside work. By and large, material posted by you as an individual colleague on your own social media profiles is a personal matter and no business of the Council's.

65. Social media can have an impact on the Council and your work both in a positive and a negative way. In a positive sense, using social media can be a good way to connect with other

professionals working in the same area as you locally, regionally and nationally, to learn and share good practice. It's also beneficial to the Council for its employees to talk positively about their work on social media and to be able to see material posted and comments made on corporate and service-related social media accounts so they can share it through their own personal networks.

66. However, there is the potential for personal social media use to reflect negatively on the Council and its reputation or impact on your employment if any material posted is inappropriate, inaccurate, illegal or contravenes the Code of Conduct for Employees or the Members' Code of Conduct.

67. Also, with social media accessible at work though the Council's IT network, employees need to be mindful of ICT Policies including the Email and Internet Policy.

68. With the above in mind, this Guidance provides a framework to help you as a Council employee access and use social media in an effective, safe and appropriate way – highlighting some dos and don'ts, particularly relating to legal and regulatory issues.

Specific guidance regarding personal use

69. You need to ensure that your personal social media use does not contravene the Code of Conduct for Employees or any ICT Policies including the Email and Internet Policy.

70. **Make clear that what you say is representative of your personal views only.** Use a disclaimer - when using social media for personal purposes, you must not imply you are speaking for the Council. It should be noted that even when using a disclaimer, the law and the Council's Code of Conduct still applies. Avoid use of the Council e-mail address, logos or other Council identification.

71. You must not set up any social media profiles on behalf of a Council service or function without having first discussed it with the Communications and Marketing service and received approval, the appropriate guidance and training.

72. The Council will accept no liability for an individual's participation on social media sites, whether in a professional or personal capacity. Remember that if you break the law using social media (for example by posting something defamatory), you will be personally responsible.

73. Ensure the following best practice is upheld:

- You need to ensure that any material you publish via social media does not contravene laws relating to copyright, libel, privacy and data protection
- Use of social media sites must at all times be consistent with the Council's duty to safeguard children, young people and vulnerable adults, in accordance with relevant statutory requirements and service specific protocols
- The reputation and / or business of the Council, service users, partners or others connected with the Council must not be brought into disrepute through use of social media sites
- Be mindful of the comments you make on social media if you are in a politically restricted post
- By identifying yourself as a Council employee within a social network, you will be connected to your colleagues, managers and even Council citizens. You should ensure that content associated with you is consistent with your work at the Council.
- Think twice and always use discretion in all personal communications in social media.

74. If in doubt about personal use of social media then seek advice from your line manager, HR or the Communications and Marketing service.