

Merthyr Tydfil County Borough Council

Social Media Policy

Information Governance Team



Cyngor Bwrdeistref Sirol
MERTHYR TUDFUL
MERTHYR TYDFIL
County Borough Council

POLICY SCHEDULE

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1. Introduction

- 1.1 Merthyr Tydfil County Borough Council (the Council) recognises that there are many benefits and opportunities that social media can bring as a tool. Alongside other communications it can help the Council to communicate with the residents of Merthyr Tydfil, to consult and engage with them on new developments and projects and to raise awareness of the Council's activities.
- 1.2 This Policy outlines how and why the Council will manage a corporate social media presence across various social media platforms. This Policy also describes the standards expected to be abided by each employee that participates in the use of social media.

2. Objective

- 2.1 The objective of this Policy is to provide guidance to employees on the acceptable use of social media.
- 2.2 This Policy is intended to minimise the risk of social media which can impact on the wellbeing of employees and the reputation of the Council. It is the Council's aim to ensure that employees are able to enjoy the benefits of social networking whilst understanding the standards of conduct expected by the Council.
- 2.3 This Policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Wikipedia, Instagram, Vine, Tumblr, and all other social networking sites, internet postings and blogs (see Appendix 1 for further descriptions and categories of social media).
- 2.4 This Policy has been developed to manage the way in which the authority complies with the ISO 27001 standard.
- 2.5 This Policy should be used in conjunction with the Employee Code of Conduct, Disciplinary Policy, Dignity and Respect at Work Policy, the Information Security Policy and the Data Protection Policy. This Policy on the use of social media is in addition to the Council's existing policies on Internet Acceptable Usage and Email Acceptable Use.

3. Scope

- 3.1 This Policy covers the use of social media by employees for both business and private purposes, regardless of whether it is used during or outside office hours, or regardless of whether accessed using computer or electronic communication systems and equipment of the Council or the personal equipment of an employee or others.

- 3.2 This Policy has been developed in conjunction with the recognised trade unions and applies to all employees (including all employees, workers, volunteers and any third party contractors) of the Council.

4. Policy Statement

- 4.1 It is the Council's policy to ensure that all employees are aware of their responsibilities in relation to their use of social media both professionally and privately.
- 4.2 The purpose of this Policy is to outline employee responsibilities when using the internet to access social networking websites. It is designed to make employees aware of the risks to the Council's confidential and proprietary information, reputation and compliance with legal obligations so that employees understand their responsibility in preventing or minimising these risks. In setting and monitoring these standards, the Council will comply with the individual rights of employees and any further legislative requirements.
- 4.3 Where employees accesses social media for work-related purposes, or personal use when using the Council's ICT equipment and facilities the Information Security Policy and supplementary policies will apply.
- 4.4 This Policy does not form part of an employee's contract of employment and it may be amended at any time.

5. Policy Principles

- 5.1 Where appropriate employees may be asked to comment on social media posts within their area of expertise, in order to provide tailored and suitable responses to posts relating to activities of the Council. All such requests will be channelled through the Corporate Communications Team.
- 5.2 When using social media, employees should never represent themselves or the Council in a false or misleading way.
- 5.3 Employees should never reveal confidential information about the Council or its employees. This can include personal and personal sensitive information about Council employees, clients and contractors, the creation of Council policy, internal discussions or commercial interests of the Council and its contractors.
- 5.4 Employees should apply the same standards of conduct online as they are expected to apply offline.
- 5.5 The Council's Corporate Communications Team is responsible for managing and overseeing the Council's presence across all social media platforms. Managers and heads of service are responsible for social media accounts within their respective service areas.

6. Corporate Social Media Accounts

- 6.1 Employees are not permitted to create a corporate social media account without the approval of the Corporate Communications Team and their manager or head of service. All corporate social media accounts that are created without approval will be deleted.
- 6.2 If Social Media is required as part of a role then the Head of Service must authorise and submit an ICT Request Form authorising the employee to have Social Media access. The employee must adhere to the Social Media Policy at all times when publishing posts on behalf of the Council.
- 6.3 When posting real time or live social media updates employees must receive permission from their manager or head of service prior to the activity taking place. If the manager or head of service is unavailable the Corporate Communications Team must approve the use of real time posting before it is placed in the public domain.
- 6.4 When using corporate social media accounts employees must be mindful when commenting on contentious issues, and ensure that they continue to adhere to the Council's Code of Conduct and other relevant policies.
- 6.5 Employees should seek guidance from the Corporate Communications Team or their manager or head of service before discussing a topic on social media that may be considered sensitive (e.g. a crisis situation, staffing issues, intellectual property, or any other issue that may impact the Council's reputation). All social media activity around sensitive topics should be referred to the Corporate Communications Team.
- 6.6 Employees should familiarise themselves with privacy settings of social networking platforms and should ensure that these are appropriate for both content and intended audience.
- 6.7 Content posted on corporate social media sites by employees which does not conform to the Council's expectations will be deleted.

7. Corporate Social Media Post Content Principles

- 7.1 Corporate social media posts will be clear and use language accessible and suitable for the platform on which they appear. The language used in corporate social media posts will be informal in tone, but reflect the Council's position as an authoritative and credible public authority.
- 7.2 Updates will be provided timely, informative and relevant, addressing current topics of interest and will contribute positively to public discussions about the Council's activities. Where appropriate the Council will pursue opportunities to signpost relevant content across alternative social media platforms.

- 7.3 Where possible the Council will post media such as photos and videos and share links to relevant projects within the borough.

8. Personal Use of Social Media Accounts

- 8.1 Council employees are permitted to use the internet for personal use between the hours of 12pm-2pm provided they are clocked out. Employees should ensure that their use of social media complies with this Policy. Personal use of social media by means of Council computers, networks and other IT facilities, resources and communications systems is not permitted during working hours.
- 8.2 All private social media accounts must be created using a personal email address. Corporate email addresses (ending in @merthyr.gov.uk) should not be used for private social media accounts under any circumstances. Failure to abide by this is a breach of this policy.
- 8.3 If an employee chooses to disclose their affiliation with the Council they are required to remain professional in what is posted and in the image portrayed in their profile.
- 8.4 If an employee comments on the activities of the Council using a personal social media account, without the Council's permission, they must make it clear in their social media posting, or on their personal profile, that they are speaking on their own behalf and your views do not represent the Council e.g. by stating "the views in this posting do not represent the views of Merthyr Tydfil CBC".
- 8.5 Employees are reminded that social networking platforms are in the public domain and it is not always possible to know what information is being viewed, shared or archived, this will include information that is posted within a closed profile or group. There can be no reasonable expectation that posts will remain private and will not be passed on to other people, intentionally or otherwise. Material published online may have the potential to be available publicly, indefinitely.
- 8.6 Employees are advised not to engage in a dispute or disagreement that is present on social media relating to Council activities. If employees become aware of any contentious posts relating to the Council employees are encouraged to inform the Corporate Communications Team who will investigate the issue. Employees should refrain from commenting on anything related to legal matters, litigation or any parties the Council may be in dispute with.
- 8.7 If employees inadvertently become involved in a contentious post the Council asks that they remain appropriate and polite in all responses. If necessary employees should seek advice from the Corporate Communications Team and disengage from the dialogue in respectful manner that reflects well on the Council.

9. Employee Responsibilities

- 9.1 Employees are responsible for their words and actions in an online environment and are therefore advised to consider whether any comment, photograph or video they choose to post on a social networking site is something they would want fellow colleagues, members and other employees of the Council, including the Senior Management Team to see.
- 9.2 Employees must avoid making any social media communications that could damage the Council's reputation, even indirectly. Employees must remember that they are representatives of the Council even when using personal social network accounts.
- 9.3 Employees must not use or disclose any Council information that has been acquired during the course of business under any circumstances on their private social media accounts or in any private posts without the Council's permission.
- 9.4 Employees must not post comments about sensitive business-related topics, such as the Council's performance, or do anything to jeopardise the Council's confidential information and intellectual property. The Council's logos must not be included in any private social media posting or in their private profile on any social media that has not been authorised by Corporate Communications or a manager or head of service.
- 9.5 Employees must not express opinions on behalf of the Council via their private social media, unless expressly authorised to do so by the Council's Corporate Communications team or their manager or head of service.

10. Monitoring

- 10.1 The content of our electronic communications systems and equipment are the Council's property. Employees should have no expectation of privacy in any message, file, document, data, facsimile, telephone conversation, social media post upload conversation or message or any other kind of communication or information transmitted to, received or printed from, stored or recorded on our electronic communications systems and equipment.
- 10.2 The Council reserves the right to monitor, retrieve and review, without further notice, but not limited to, employees social media postings and activities using the Council's electronic communications systems and equipment, to ensure compliance with the Council's rules and for legitimate business purposes and employees consent to such monitoring by their acknowledgement of this Policy and their use of such resources and systems.
- 10.3 The Council's electronic communications systems and equipment should not be used for any matter that employees wish to be kept private or confidential from the organisation.

- 10.4 The Council reserves the right to restrict access to social networking websites without prior notice.

11. Recruitment

- 11.1 Any employees who is expected or encouraged as part of their duties to use social media on behalf of the Council for recruitment purposes, must seek prior approval for such communications from their manager or head of service. Employees may be required to undergo training and restrictions or requirements may be imposed on their activities.
- 11.2 External employment and recruitment opportunities can only be posted on the Council's corporate social media accounts with the written consent of the Human Resources Department.
- 11.3 The content of all recruitment social media posts must be approved by the Corporate Communications Team or the manager or head of service.
- 11.4 The Council does not permit the use of internet searches for prospective candidates on social networking websites for recruitment purposes. This is in line with the Council's Equal Opportunity Policies and Procedures.
- 11.5 Employees are prohibited from providing references (positive or negative) for other individuals on social networking websites as they can create legal liability for both the author and the Council, (since they can be attributed to the Council).

12. Defamation

- 12.1 If an employee becomes a victim of defamatory comments, abuse or harassment via social media from a member of the public or by another employee in relation to their employment with the Council, they should report this matter immediately to their manager or head of service.
- 12.2 Private and corporate social media accounts must not be used to defame or disparage the Council, Council employees or any third party including members of the public; to harass, bully or unlawfully discriminate against any Council employee or third parties; to make false or misleading statements; or to impersonate a colleagues or third parties.
- 12.3 If employees are found to have made defamatory comments about the Council, another employee or any third party including members of the public they may face disciplinary action in accordance with the Council's Disciplinary policies and procedures.
- 12.4 The Council takes its duty of care to employees very seriously and will do all we can to support our employees in the event of such an issue.

13. Reporting Defamatory Social Media Posts

- 13.1 Employees are encouraged to report any defamatory posts relating to the Council or other employees to their manager, head of service and the Corporate Communications Team.
- 13.2 Where possible employees may be asked to provide evidence of the defamatory post, such as a screen shot, to be used as part of the Council's investigation.
- 13.3 In the first instance the Council's Corporate Communications Team will contact the author of the post and ask for them to remove all defamatory remarks which will include comments, videos, photographs, links etc.
- 13.4 In the event that the author refuses to comply with the request to remove the post depending on the content of the post further action may be taken by the Council.
- 13.5 The nature of the defamatory post will dictate the type of investigation initiated. The outcome of this investigation may lead to a disciplinary investigation being undertaken.
- 13.6 Where the author of the post is an individual and not an employee of the Council, the affected employee will be able given an opportunity to express their chosen course of action, with the support of the Legal Department and the manager or head of service of their respective service areas.
- 13.7 Should an employee feel that their life is in danger or that there is a real threat of violence they should contact the police immediately.

14. Breaches of this Policy

- 14.1 Social media must not be used in a way that breaches any of the Council's other policies or agreements. If a post, comment, blog etc. on the internet would breach any of the Council's policies in another forum, it will also breach them in an online forum.
- 14.2 A breach of this Policy may result in disciplinary action up to and including dismissal.
- 14.3 Failure to abide by the rules and procedures written in this Policy will be classed as a breach of this Policy.
- 14.4 Breaches of this Policy will be considered in accordance with the Council's disciplinary policies and procedures and may result in disciplinary action.
- 14.5 Employees may be required to remove any social media content that the Council considers to constitute a breach of this Policy. Failure to comply with such a request may in itself result in disciplinary action.

- 14.6 Any misuse of social media must be reported to the Council's Corporate Communications Team.

15. Legal Considerations

- 15.1 In creating this policy the Council has given due regard to the following Legislative frameworks:

15.1.1 The Human Rights Act 1998 – Article 8 of this Act gives a right to respect for private and family life, home and correspondence. The Council acknowledges that employees have a reasonable expectation of privacy in the workplace. This Policy does not intend to infringe your Article 8 rights.

15.1.2 The Data Protection Act 1998 – This Act provides a legal framework which sets out how information relating to employees, customers, clients etc. can be collected, handled and used. This Policy aims to set out how the Council will comply with data protection across social media platforms.

15.1.3 The Regulation of Investigatory Powers Act 2000 – This Act covers the extent to which the Council is able to monitor and record private communications received within its telecommunication systems. It applies to all public and private communications networks. The Council will abide by these Regulations and will not unlawfully intercept employee's communications. Where appropriate approval will be sought prior to any interference of staff private communications.

16. Implementation Responsibilities

- 16.1 The Corporate Communications Team shall develop, maintain, and publish processes to achieve compliance with this Policy.
- 16.2 The business use of social media is subject to the entirety of this Policy.
- 16.3 Employees will be aware of and adhere to all other relevant policies and procedures.
- 16.4 All Heads of Service shall be responsible for implementing this Policy within their areas of responsibility.

17. Policy Review and Maintenance

- 17.1 The Social Media Policy shall be reviewed annually and at times as dictated by operational needs.

18. Policy Acceptance

All employees shall sign the Information Security Policy to indicate their agreement to comply with the Social Media Policy.

Appendix 1 – Categories of social media

Social media sites, applications and services fall into one or more of several fundamental categories. Because of constantly evolving technology and the growing mainstream use of social media, certain websites, web services and applications fit into more than one category, and may evolve over time to fall into different categories. It is useful to understand the characteristics of each category when examining the legal issues relevant to each of these categories.

- **Blog:** a "web log" or website listing posted information and other content dated in reverse chronological order, self-published by authors (known as bloggers) on sites such as Blogspot, WordPress, Tumblr and Blogger.
- **Social and business networking site:** a website where individual, corporate and organisational users can connect to other users and display online their networks of friends and contacts for other users to see and form connections with. Prominent examples include Facebook and LinkedIn.
- **Digital media sharing site:** a website where users can upload and share videos, photographs and accompanying text. YouTube and Flickr are the principal sites in this category.
- **Crowdfunding sites:** a website where users can look for investment from a wide range of people who will contribute small amounts of finance. Examples include Kickstarter, Peoplefund.it and Global giving.
- **Wiki:** a database of web pages that can be edited live by the public, such as Wikipedia and Wikitravel.
- **MMORPG (Massively Multiplayer Online Role-Playing Game) site:** MMORPG is a genre of video games that can be played by several users simultaneously regardless of physical location, over the internet. Players adopt avatars to represent themselves in the virtual world online and interact with each other. SecondLife is the most popular example of this category. An avatar is a customised character in digital form created by an online user to personify his presence on a website and interact with other users, such as in online gaming communities, virtual worlds (*see below*) or forums.
- **Virtual world:** a computer-based environment, such as a MMORPG, created to simulate a real or fictitious environment, often containing elements of both. Users of online virtual worlds interact through their avatars (*see above*). Popular examples include ActiveWorlds, Kaneva and SecondLife.

Appendix 2 - Popular social media sites and services

Social media sites connect their users to one another, to new content and to communication channels that allow for an instant and permanent online presence. Many sites include traditional communication capabilities within their proprietary technologies, such as e-mail, chat (for example, Instant Messaging), blogging and others. The principal function of most social media sites is to provide links to users and publish these links online for others to see.

Below is a list (with descriptions) of some popular social media sites, services and applications. Although not exhaustive, it includes the most popular social media sites on the internet.

- **Activeworlds:** A platform that hosts over 1000 3D virtual worlds, creating interactive online experiences for users.
- **A Small World:** an invitation-only social networking service that includes private messaging, forums and event calendars.
- **Delicious (formerly del.icio.us):** a social bookmarking site where members can save their website bookmarks in a central online location for future retrieval from any internet browser at any time, and share those bookmarks with friends.
- **Digg:** an online community where users discover, vote for, share and comment on content from the internet, including news, video and images.
- **Doostang:** a career-focused social networking site that enables members to post and apply to job openings, network with friends and friends of friends online and conduct job searches according to industry, geography and other criteria.
- **Facebook:** a social networking site where members can connect with friends and other people in their network, post links, comments, photos and videos and conduct public conversations by writing on members' "walls". It also allows members to post private messages not visible to the public.
- **Flickr:** an online photo management and sharing application that enables members to make the photo and video content they upload available on the web for viewing and commenting (public and private). Flickr is for personal (non-commercial) use only.
- **Foursquare:** A location-based social networking service generally logged into using a mobile device where users share their location with friends, check in to businesses to collect points and badges and post information about nearby business or venues.

- **Friendster:** originally a social networking site that was relaunched in 2011 as a social gaming site. Also has a micropayments component called Friendster Wallet, enabling pre-paid payments between members on their sites for virtual gifts and games.
- **Geni:** a website for families to privately connect with relatives, post pictures and send messages to other members in their online family tree. Members build their family tree by connecting with other relatives who are members of the website and posting personal family data.
- **Google +:** a social network launched by Google in 2011 where members can connect with friends and other people in their "circle" and see what other people are posting through their "stream". Members can also "hang out" and video chat.
- **Instagram:** is a photo sharing service where users can share photos which have had digital filters added to them onto social networks like Facebook or Twitter. It is owned by Facebook.
- **Kaneva:** A platform that hosts a free, 3D virtual world for users to gain an interactive experience through chatting, playing games, shopping and hanging out.
- **Kickstarter:** a crowdfunding website which allows members to invest in projects for non-commercial gain.
- **LinkedIn:** a professional networking website where members can maintain connections with other members, establish connections to contacts of members in their network and be introduced to other members for help in job searches and other career-related goals.
- **Meetup:** A social networking website that allows users to organize into groups and plan face-to-face meetings.
- **MySpace:** a social networking website where members can personalise their profile pages, and to which they can post text, pictures, video and audio. Members can share all of the content they post with member friends connected to their profile, as well as with the public, and can make their pages private so that they are not accessible to unconfirmed friends.
- **Newsvine:** an online news website where members can post news articles and comments, and vote for published articles to appear at the top of Newsvine's popularity list of news stories. Newsvine is a subsidiary of NBCNews.com.
- **Pinterest:** is a pin-board style social sharing site where users can create and manage image collections based on themes such as events, interests and hobbies. Users can "re-pin" other people's images to their own board, like images or search through categories that interest them.

- **Reddit:** A social news website that allows users to submit content that other users vote on, which ranks the posts and determines their position on the site's pages.
- **Second Life:** a user-created, three-dimensional virtual world community, where members can create and customise an online three-dimensional persona known as an avatar and conduct purchases using virtual currency known as Linden dollars (L\$). Second Life provides the capability for businesses to develop and maintain a virtual presence, as well as a web-based marketplace where members can buy and sell products for avatars' use on the site.
- **StumbleUpon:** a discovery engine (a form of search engine) which finds and recommends content that is relevant to its users.
- **Tumblr:** a blogging website where members can post and share text, photos, links, music and video from their browser, phone, desktop computer and e-mail.
- **Twitter:** a microblogging site where users post status updates on their thoughts or activities in 140 characters or fewer, through instant message, mobile text or the web.
- **Typepad:** A fee-based blogging service that allows users to create blogs and use search engine optimization (SEO) and social media optimization (SMO) tools.
- **Wordpress:** An open-source software (www.practicallaw.com/9-501-6355) program that allows users to publish websites or blogs.
- **Yammer:** a microblogging site similar to Twitter aimed at streamlining internal workplace communications. Although it is free for employees to use, companies who want to get control of and manage their corporate Yammer networks must pay a fee. Yammer is owned by Microsoft.
- **YouTube:** an online video community that allows users to publicly post, share and view original videos, with a forum for user comments and a platform for creating individual channels. YouTube provides for video embedding, allowing users to link video posted on YouTube to their profiles on Facebook, MySpace, blogs and any website.