

# Social Media policy

**John Porter**

Communications Business Adviser - Digital Engagement  
Revised 2019



# Contents

---

## **3** Social media policy – Revised 2019

- 3 Purpose
- 4 The scope
- 4 Responsibility for implementation of the policy
- 5 Business use of social media
- 6 Personal use of social media
- 7 What happens if it goes wrong?
- 8 Breach of policy
- 8 Monitoring and review of this policy

# Social media policy – Revised 2019

---

This policy provides guidance to employees on the use of social media, both for business and personal purposes and sets clear expectations of employee's conduct. This is to ensure that employees are able to use social media effectively for both business and personal purposes without inadvertently placing themselves in a situation where the appropriateness of their conduct is called into question.

While the guidelines and expectations regarding conduct must be followed by all employees it should be noted the policy document itself does not constitute a term of the contract of employment. Staff should refer to the council's [employee code of conduct](#) for specific guidance on how the council expects them to behave.

The social media policy may be amended, withdrawn, suspended or departed from at the discretion of the council at anytime.

All staff must ensure that they are familiar with, comply with the contents of, and support the council's policies, procedures and guidance.

## Purpose

Social media is an increasingly popular means of communication that allows people greater freedom in how they express themselves both socially and for business purposes. For many it is now their preferred way of finding out what is going on or contacting organisations like the county council.

Engaging with people through social media can give us, as a council, connection and dialogue with residents we may not reach through other channels. Conversations are already happening out there relating to council services – and we have an opportunity to get involved, help people to find the right information and correct misconceptions!

This policy will help you to make the right decisions about social media. Even if you are not actively using it for your service your customers may be talking about their experiences in public forums. It is, therefore important to have an understanding of the opportunities, as well as the risks social media brings. This policy outlines the standards we expect when you engage in social media, in both a business and personal capacity.

This policy should be read alongside the operational guidance on social media.

# Social media policy – Revised 2019

---

## The scope

For the purposes of this policy, social media is any type of online media that allows discussion and interaction as opposed to broadcast only.

There are several types of social media we, as a council, use now or may use in the future and this policy covers all types, for example:

- Social networking (Facebook, LinkedIn, Google+).
- Microblogging (Twitter, Tumblr).
- Photo sharing (Instagram, Snapchat, Pinterest).
- Video sharing (YouTube, Facebook Live, Periscope, Vimeo)

This policy also covers private messages sent over online channels such as direct messaging via Facebook, Twitter and WhatsApp.

This policy applies to all employees of Gloucestershire County Council including;

- Gloucestershire Fire and Rescue Service
- agency workers
- casual workers
- consultants
- interims engaged from time to time by the council.

The policy does not cover council staff employed in schools as schools are expected to have their own policy.

## Responsibility for implementation of the policy

Employees are responsible for their own compliance with this policy and for ensuring that it is consistently applied to protect the privacy, confidentiality, reputation and interests of the council. In this regard the expectations regarding use of social media are covered by the council's code of conduct for employees.

Any concerns about social media use should be discussed with your line manager in the first instance. If this isn't possible, please speak to the Communications Team or use the council's Whistleblowing procedure.

# Social media policy – Revised 2019

---

## Business use of social media

Before embarking on using social media for business purposes employees must comply with the requirements set out in the current operational guidelines.

Generally, the use of social media in a business context is to:

- promote and publicise activities that will enhance the reputation of the council, the services it provides and commissions, and the wider community of organisations with which it works in partnership
- respond to specific questions from the public, businesses and partners
- clarify or correct any unclear or incorrect statements or views
- provide information, advice and guidance (particularly in emergency situations)
- Initiate and participate in dialogue with the public relating to council services
- Promote the image of a human and approachable council

Business services must have sufficient resources to manage their social media accounts (once agreed with the Communications Team) so they can respond to questions and feedback within the council's recommended response times.

All information and responses you post as an employee are public statements and count as a council record and are evidence of the council's work. They may be used as reference at any time in the future and **you are responsible for anything that you say online.**

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.

You must not disclose any politically sensitive information. Politically sensitive includes, but is not restricted to, matters that are being considered or debated, or are due to be considered or debated, by the council or cabinet or one or more of the council's committees (or are awaiting a decision as a result of such consideration/debate). It also includes subject matters which are known to be, or could reasonably be considered likely to be, politically controversial. If you are in any doubt you should seek advice from your line manager.

Never publish confidential information through social media 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, council employees as well as council related information. This requirement continues after you have left employment.

# Social media policy – Revised 2019

---

You should **NEVER** use social media to ‘spy’ on service users covertly, even if they have not setup privacy settings as this could contravene Article 8 of the Human Rights Act. To make sure you stay within the law you must read and follow the clear procedural steps laid out in the [Covert Surveillance Procedural Guidance](#). If you are in any doubt, you should get advice from Legal Services before taking any action.

You should keep in mind the relevant council policies and guidance when considering any social media activity, whether business or personal. The following documents relate to the county council and will be available on Staffnet or the main GCC website.

- Code of Conduct
- Internet and Digital Communications policy
- Fairness and Diversity in Employment Policy
- Data Protection and Freedom of Information Guidance
- Regulation of Investigatory Powers (RIPA) procedural guidance
- Expression of Employee Views
- Safeguarding Guidance:
  - Safeguarding Adults in Gloucestershire
  - Safeguarding Children in Gloucestershire

## Personal use of social media

As the use and popularity of social media grows, the line between what is public and private, personal and professional can become blurred. It is important therefore that employees are aware that their personal digital activity could have an adverse impact on their professional role or the council's image and reputation.

Even if you do not expressly name the council as your employer on social media, this policy will still apply if a connection with your employment can be reasonably made.

You should refer to council policies for guidance on what the council considers to be unacceptable in any public comment you make about services delivered or commissioned by the council.

Specifically, the council will not tolerate any of the following activity on social media if it can be connected to you as an employee of the council:

- abusive or threatening behaviour
- inappropriate comments or material that may be regarded as discriminatory
- false or misleading statements that could have a negative affect on the council's reputation
- inciting or supporting somebody to commit a crime or other unlawful acts

This could include content you share or like as this could suggest you approve of that content.

You must consider carefully whether you accept ‘friend requests’ from service users, their families, friends or others e.g. contractors, elected members. Accept them only if you are quite sure this will not put you, as a council employee, in the position of having a real or apparent conflict of interest.

# Social media policy – Revised 2019

---

As is the case for business use of social media you should never publish anything that is confidential to the council or use social media to comment on potentially sensitive matters, including – but not restricted to – the following:

- information about service users
- information that is politically or commercially sensitive
- any information intended for internal use only (including matters concerning council services, organisational change or related proposals)
- intellectual property.

Do not use council email addresses and other official contact details for setting up personal social media accounts or for communicating through such media.

Whilst we are encouraging more social media engagement from employees there is still a requirement not to use your personal social media during core work hours. Occasionally you may need to use your personal social media network for business purposes and this is allowed if authorised by the Communications Team. For example:

- To manage a service specific Facebook page as these must be administered from a personal Facebook profile
- To post a GCC or service specific message to a closed Facebook group you belong to.

Many council employees are also residents so in some circumstances it may be appropriate to use a personal account to participate in social media activity run by the council.

Do not use personal social media to raise or discuss a complaint or grievance about the council, your manager, colleagues etc. If you have a complaint, you should use the council's formal grievance procedures.

If your post is 'politically restricted' these restrictions will also relate to social media.

## What happens if it goes wrong?

You should always show respect to others when using social media and ensure that your actions do not have a negative impact on the council's reputation.

Mistakes happen – if you post something you didn't mean to, or get a message or response wrong, tell your line manager and the Communications Team immediately to agree remedial action and minimise embarrassment and reputational damage.

Anyone who feels that they have been subject to cyber-bullying or offended by material posted or uploaded by a colleague through any digital communication network should inform their line manager who will take advice from HR and investigate the matter as appropriate.

The council regards cyber-bullying as seriously as any other form of bullying or harassment. Cyber-bullying will not be tolerated and will be regarded as misconduct that could lead to formal action, including dismissal in serious cases, under the council's Disciplinary and Dismissal Procedure.

# Social media policy – Revised 2019

---

If your online activities are considered to breach the council's social media policy, the council may require you to remove content that, in the reasonable opinion of the council, breaches the policy.

It should also be noted that, although there is not at present a legal definition of cyber bullying within UK law, there are a number of existing laws that can be applied to cases of cyber-bullying and on-line harassment, which could constitute a criminal offence, including:

- The Protection from Harassment Act 1997
- The Criminal Justice and Public Order Act 1994
- The Malicious Communications Act 1988
- The Communications Act 2003 (s.127)
- The Defamation Act 2013

The council expects managers to support staff when they raise concerns relating to cyberbullying and take care to make an informed evaluation of the severity of the incident. Safety, Health and Environment (SHE) or the Communications Team will provide advice to managers and any individual adversely affected by comments made about them on the internet.

For more information read the SHE guide to cyberbullying available on Staffnet.

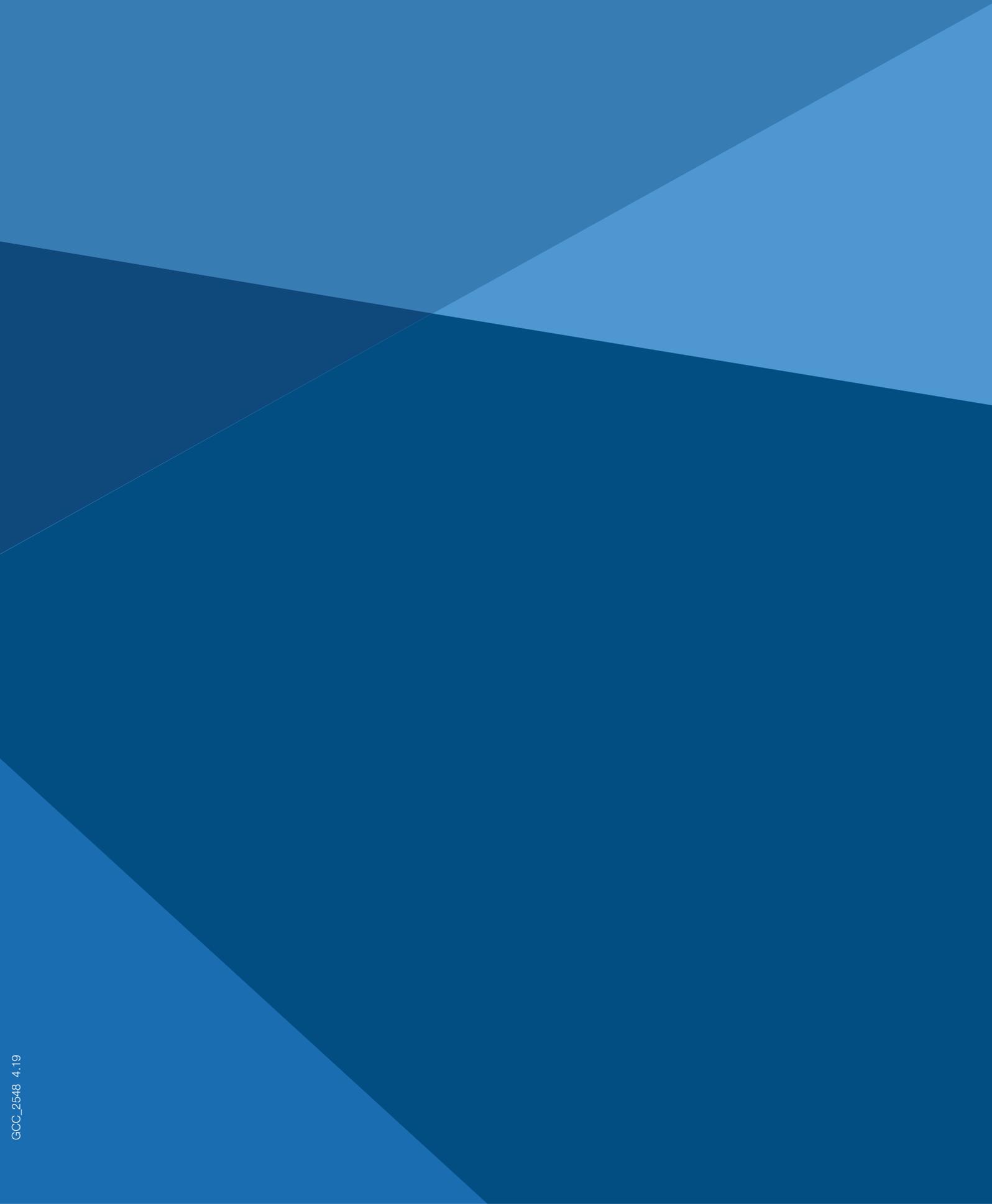
## Breach of policy

Please note that breach of this social media policy may lead to formal action under the council's Disciplinary and Dismissal Procedure up to and including (in serious cases) dismissal.

## Monitoring and review of this policy

This policy will be reviewed annually by the Head of Communications in consultation with Human Resources, Legal Services and Information Management to ensure that it meets legal requirements and reflects good practice.

Employees are invited to comment on this policy and suggest how it might be improved by contacting the Communications Business Adviser – Digital Engagement on [communications@gloucestershire.gov.uk](mailto:communications@gloucestershire.gov.uk)



GCC\_2548 4.19

**Communications  
Brand & Digital  
Content**

