

**SOCIAL MEDIA POLICY**

**2022**

**Updated Staff Social Media Policy November 2021**

**Policy Purpose**

This policy is to ensure everyone in the organisation understands MVDC’s rules about social media use, both during work time, for work purposes and also as an employee when discussing MVDC on any digital platform.

This policy will help you to make the right decisions about social media, and understand the impact if you get it wrong. It outlines the standards we expect when you engage in social media, for both business and for personal use when the latter impacts MVDC or your colleagues. Additional guidance supplements the policy and is available via [Molly](https://molly.molevalley.gov.uk/myhr/employment-policies/), our staff intranet.

The main addition to the policy that you need to be aware of is the rules around the use of digital sources, such as social media, as part of your job, particularly where this involves investigating something.

There is basic guidance around how we monitor posts on social media on [Molly](https://molevalley.gov.uk/social-media).

**Benefits of Social Media**

Engaging with social media brings many positive benefits not least, the opportunity to access real-time news from across the globe. During the pandemic it has allowed individuals to connect whilst apart and virtually ‘gather’, increasing wellbeing and reducing loneliness. It enables us all to take part in discussions, learn, be entertained, share our interests, meet people, inspire and get inspired. It can give us, as an organisation, a deeper connection and dialogue with residents, including those that we may not reach via other more traditional channels.

It helps us promote our services and uphold our reputation. Conversations are already happening out there in our community – social media is our opportunity to get involved.

**Policy Scope**

For the purposes of this policy, social media is any type of interactive digital media that allows parties to participate in discussions and/or share information in a public forum. This includes, but is not limited to, online social media sites such as [Twitter](https://twitter.com/MoleValleyDC), [Facebook](https://www.facebook.com/molevalleydc), [Instagram](https://www.instagram.com/molevalleydc/), [Next Door](https://nextdoor.co.uk/agency-city/england/mole-valley/) and [LinkedIn](https://uk.linkedin.com/company/mole-valley-district-council).

Social media also covers blogs, online forums and noticeboards, video and image-sharing websites such as [YouTube](https://www.youtube.com/user/molevalleydc), [Vimeo](https://vimeo.com/search?q=mvdc) and [Flickr](https://www.flickr.com/search/?text=mole%20valley%20district%20council). There are many more examples of social media, if it is online and open to public viewing (however small the group), this policy applies. Social media is quite broad so the policy includes all the parts of a platform, so for example, Facebook includes Facebook Market Place.

Anyone working for MVDC is required to read and understand this policy at induction. This includes all employees, agency workers, casual workers, consultants and interims. The policy can be amended at any time, subject to our normal consultation process and is available on Molly, our staff intranet site.

**Responsibility for all Staff**

You are responsible for your compliance with this policy and for ensuring that it is consistently applied to protect the privacy, confidentiality, reputation and interests of MVDC and all its staff.

Expectations regarding use of social media are considered to fall within the [MVDC’s Staff Code of Conduct](https://molevalleydc.sharepoint.com/%3Aw%3A/s/Team-HRa/EefAPGqI3E5AollBZn5CxpABv2Dc4Jck5LTs-4K81EVbyA?e=rlmCza). You should ensure that you take the time to read and understand the policy and accompanying guidance. If you breach this policy you may face action under our [disciplinary procedure](https://molevalleydc.sharepoint.com/%3Aw%3A/s/Team-HRa/EficgH1mknlHuN7y44HbOE0B16lyKbdqxHQ1A-Pzd_YY-w?e=tbuCUK).

All concerns or questions about social media use should be reported to your line manager in the first instance. If this is not possible, please speak to the Senior Digital & Content Communications Officer.

**Business use of Social Media**

**Permissions**

Before creating any business social media accounts you must have discussed with and had approval from the Communications Manager. Please discuss your requirements well in advance of wishing to do this and be sure you have considered the ongoing work and essentially the resources required to create engaging, interesting content over the long term, including a consistent output of high quality images.

Please note that the Communications Team will require all passwords, including as they are regularly updated. The team will pause, hide, remove or delete posts ideally in discussion with, (or where deemed necessary without prior discussion) from any MVDC sites as it deems necessary.

All staff using social media for business purposes must have read this policy and guidance.

**Activities**

Using social media in a business context for MVDC is to:

* Engage with residents and businesses as an approachable and informative contact, this could include celebrating local initiatives, congratulating local businesses and engaging with local conversations
* Promote and publicise activities that will enhance MVDC’s reputation, 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 (only to be completed with guidance from the Communications Team)
* Provide information, advice and guidance (particularly useful in emergency situations)

Teams must ensure they have sufficient resources to look after their social media accounts. Your ‘friends’ and ‘followers’ will expect quick responses to any queries, and you will need to update your accounts regularly. Remember social media is a two-way conversation – you will get feedback, and some of it may be challenging. All your posts and responses are public statements and **you are responsible for anything that you say online.**

Accounts that you choose to ‘follow’ will be visible to the public on social media channels. We encourage following a wide range of accounts to both boost followers, read content from outside of Mole Valley and increase opportunities to engage and learn from a wide range of people. Do take care that any sites you follow do not contain any offensive material. We advise reviewing followed sites intermittently to make sure they are still active and relevant.

Remember that professional, clear communication using commons sense works best on social media.

All information that you post as a member of staff is recorded online and is evidence of the MVDC’s work. It may be used as reference at any time in the future. You must not use any information that you obtain in the course of your work for MVDC for personal gain, or pass it on to others who may use it in such a way.

**Points to Remember:**

1. You can only write from MVDC’s social media accounts if you are authorised to do so and you must always make sure anything you do say is accurate and lawful. If ever in doubt, always check before you post.
2. You must not disclose any politically sensitive information. Politically sensitive information may relate to matters that are being considered or debated, or are due to be considered or debated, by the Council or Executive or one or more of the Council’s committees (or are awaiting a decision as a result of such consideration/debate). It will also include subject matters which are known to be, or could reasonably be considered likely to be, politically controversial. If in any doubt in this regard you should seek advice from your line manager.
3. 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, MVDC’s staff as well as Council related information. This requirement continues after you have left employment.
4. If an accident or incident is reported using social media, you must not make any comment or give a response from MVDC, or as member of staff from MVDC. Responses to any accidents or incidents have to come via the Communications Team and the relevant SMT lead.
5. You must consider any copyright restrictions when posting content and make sure you have the right permissions to use all images, photographs and music before you post them. You must not forward any links to images or music unless you have verified that there is no copyright infringement.
6. You should never develop an on-line relationship with any child or with an adult that may be considered vulnerable. This is to avoid any harm being caused to those individuals, either intentionally or otherwise.

**Use of Social Media for Surveillance**

* **Requirements to understand RIPA regulations around all social media usage and use of it as an investigation tool, how we monitor and record that**

The viewing, checking, accessing of individual social network sites by Local Authority officers is a potentially sensitive subject, however where there is identified a genuine business need to do so the checking of sites is perfectly acceptable and legal. However officers must be cautious to avoid being viewed as overly intrusive, infringing of individual’s privacy, or acting illegally. For any occasion where it is deemed proportionate and necessary to access a social network site a record must be made on the officers appropriate case management system, recording the information obtained and reason for making the check.

In some circumstances viewing of Social Network sites, could be viewed as directed surveillance, and as such would require authorisation under the Regulation of Investigatory Powers Act 2000 (RIPA). Generally the official advice is if you are looking in order to see if something is there – this is “Open source” checks and does not require RIPA authorisation, if however you are watching or monitoring the space and collecting information about what they are doing – this is directed surveillance and will require RIPA authorisation. Repeated checking, without RIPA authorisation is not permitted, as may be deemed as surveillance and breach of the subject’s human rights. It is also not permitted to covertly attempt to make a friend request in order to access information that is not openly available. Any such request would be viewed as a Covert Human Intelligence Source (CHIS) under RIPA and again would require authorisation.

For general RIPA information about RIPA and instructions on how to make an application please see [Molly webpage](https://molly.molevalley.gov.uk/at-work/surveillance-ripa-social-media-checks-telecommunications-data/) “Surveillance / RIPA” or obtain advice from the RIPA Senior Responsible Officer or the Fraud Team.

Monitoring of staff access to websites for investigative purposes where the action viewed as directed surveillance or CHIS, will be monitored through the RIPA application process.

**Additional Relevant MVDC Policies**

You should keep in mind the following MVDC policies and guidance when considering any social media activity, whether business or personal:

[Code of Conduct Policy](https://molevalleydc.sharepoint.com/%3Aw%3A/s/Team-HRa/EefAPGqI3E5AollBZn5CxpABv2Dc4Jck5LTs-4K81EVbyA?e=rlmCza)

[Respect at Work Policy](https://molevalleydc.sharepoint.com/%3Aw%3A/s/Team-HRa/ERdZbswmRkhDhz9qdyMUUwkBmueCpbEEJvsWUCOWfygiBw?e=ataJHY)

[Disciplinary Policy and Guidance](https://molevalleydc.sharepoint.com/%3Aw%3A/s/Team-HRa/EficgH1mknlHuN7y44HbOE0B16lyKbdqxHQ1A-Pzd_YY-w?e=tbuCUK)

[Freedom of Information Publication Scheme](https://www.molevalley.gov.uk/sites/default/files/home/council/feedback-complaints-fois/publicationscheme2020.pdf)

[Data Protection Policy and Guidance](https://molevalleydc-my.sharepoint.com/personal/admin_molevalleydc_onmicrosoft_com/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Fadmin%5Fmolevalleydc%5Fonmicrosoft%5Fcom%2FDocuments%2FMolly%2FGDPR%2FGDPR%20Policy%20Statement%20v2%20March%2021%2Epdf&parent=%2Fpersonal%2Fadmin%5Fmolevalleydc%5Fonmicrosoft%5Fcom%2FDocuments%2FMolly%2FGDPR&originalPath=aHR0cHM6Ly9tb2xldmFsbGV5ZGMtbXkuc2hhcmVwb2ludC5jb20vOmI6L2cvcGVyc29uYWwvYWRtaW5fbW9sZXZhbGxleWRjX29ubWljcm9zb2Z0X2NvbS9FWU92M0J4WnctbEh0amtlUkZTTkRqOEJxckw4eEFvdTk4NC1oNjZZLUJIY3FBP3J0aW1lPWVXUzhDa3hNMlVn)

[ICT Security Policy](https://molevalleydc-my.sharepoint.com/personal/admin_molevalleydc_onmicrosoft_com/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Fadmin%5Fmolevalleydc%5Fonmicrosoft%5Fcom%2FDocuments%2FMolly%2FICT%2FICT%2DSecurity%2DPolicy%20v%206%2E0%20%28published%29%2Epdf&parent=%2Fpersonal%2Fadmin%5Fmolevalleydc%5Fonmicrosoft%5Fcom%2FDocuments%2FMolly%2FICT&originalPath=aHR0cHM6Ly9tb2xldmFsbGV5ZGMtbXkuc2hhcmVwb2ludC5jb20vOmI6L2cvcGVyc29uYWwvYWRtaW5fbW9sZXZhbGxleWRjX29ubWljcm9zb2Z0X2NvbS9FV2ZYejE2SFVSQkFrOGRseEJCRGJ0VUJ2WUhFVnRlR2RrWnItZnV0YzNjVGRBP3J0aW1lPUFxZFU5a3RNMlVn)

[Safeguarding Policy for Children and Adults at Risk](https://molevalleydc-my.sharepoint.com/personal/admin_molevalleydc_onmicrosoft_com/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Fadmin%5Fmolevalleydc%5Fonmicrosoft%5Fcom%2FDocuments%2FMolly%2FHousing%2Ffinal%2Dmv%2Dsafeguarding%2Dchildren%2Dand%2Dadults%2Drisk%2Dpolicy%2Dupdated%2D2020%20V1%2E1%2Epdf&parent=%2Fpersonal%2Fadmin%5Fmolevalleydc%5Fonmicrosoft%5Fcom%2FDocuments%2FMolly%2FHousing)[Equality and Diversity Strategy](https://www.molevalley.gov.uk/sites/default/files/home/council/about-mvdc/equalitystatementandobjectives2017-21accessible_0.pdf)

[Regulation Of Investigatory Powers Act 2000 Policy](https://molevalleydc-my.sharepoint.com/%3Aw%3A/g/personal/steve_baker_molevalley_gov_uk/ETtM0yq2E5dEsREqguGpyRgBUkr-dqiW_IlzyiMWvax2SQ?e=VaSG4P)

Remember our organisational values when using social media – Listen, Respect, Care, Trust and Lead!

**Personal use of Social Media**

Global use of social media has blurred the lines between what is public and private, what is considered personal and that that is purely professional. It is important therefore that we are all aware that personal digital activity could potentially have an adverse impact on someone’s professional role and MVDC’s image and reputation. The internet is a public space and ultimately whilst people may move on, ‘Google will always remember’ what is written and/or posted.

Even if you do not expressly name MVDC as your employer, this policy will apply if a connection between you and your employment can easily be made. People who know you and where you work may still make an association with MVDC. When you are online you can be considered as representing MVDC so always be respectful of others.

You must take personal responsibility for your own social media content. If you can be identified as working for MVDC you must make sure your profiles and anything you post, are compatible with how you are expected to present yourself to service users, councillors and residents.

The [Council’s Code of Conduct](https://molevalleydc.sharepoint.com/%3Aw%3A/s/Team-HRa/EefAPGqI3E5AollBZn5CxpABv2Dc4Jck5LTs-4K81EVbyA?e=rlmCza) applies to any public comment you make on matters relating to MVDC or specific services delivered or commissioned by MVDC. This could include sharing content posted by others which could be regarded as approval of that content.

You must always show respect to others when using social media. You must never criticise MVDC, our residents, service users, councillors, colleagues or anybody else you come into contact with through your work. Our other policies, in particular [Respect at Work](https://molevalleydc.sharepoint.com/%3Aw%3A/s/Team-HRa/ERdZbswmRkhDhz9qdyMUUwkBmueCpbEEJvsWUCOWfygiBw?e=ataJHY), give guidance on the type of behaviour we consider unacceptable in the workplace. If your social media profile can easily connect you with the workplace, we expect you to maintain the same standards when using social media as we expect in the workplace. Specifically we will not tolerate the following:

Abusive or threatening behaviour

Sexually explicit language

Unlawful or disrespectful comments

False or misleading statements that reflect adversely on MVDC

Impersonating your colleagues or third parties

Inciting somebody to commit a crime

If another colleague is bullying, harassing or victimising you using social media, you should refer to the [Respect at Work](https://molevalleydc.sharepoint.com/%3Aw%3A/s/Team-HRa/ERdZbswmRkhDhz9qdyMUUwkBmueCpbEEJvsWUCOWfygiBw?e=ataJHY) policy.

You must obtain your colleague’s permission before posting images of them or any of their personal details with particular regard to [our GDPR policies.](https://molly.molevalley.gov.uk/gdpr/)

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

* information regarding service users
* any information that breaches GDPR policies
* any information intended for internal use only (including matters concerning MVDC’s services, performance, organisational change or related proposals)
* information that breaches intellectual property rights

Do not use your MVDC email address or any other official contact details for setting up personal social media accounts or for communicating through such media.

Do not use personal social media to raise or discuss a complaint or grievance about MVDC, your manager, colleagues etc. There are formal grievance procedures for progressing these.

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

***It is advisable to set the privacy settings of your own social media accounts so that your posts are not open to everyone to view.***

**What Happens if it Goes Wrong?**

Mistakes happen – if you post something you did not mean to, or get a message wrong, tell your line manager and the Senior Digital & Content Communications Officer immediately and agree remedial action to reduce embarrassment and reputational damage.

**Online Bullying**

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

MVDC regards cyber-bullying as seriously as any other form of bullying or harassment. As with other forms of bullying and harassment, cyber-bullying will not be tolerated and will be actioned accordingly, the outcome of which could lead to formal action, including dismissal in serious cases, under the [Council’s Disciplinary Policy](https://molevalleydc.sharepoint.com/%3Aw%3A/s/Team-HRa/EficgH1mknlHuN7y44HbOE0B16lyKbdqxHQ1A-Pzd_YY-w?e=tbuCUK).

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

MVDC recognises it is the duty of every member of staff to ensure, so far as reasonably practicable, the health safety and welfare at work of all staff members and will have regard to this duty in respect of incidents of cyber-bullying.

**Breach of Policy**

If your online activities are considered to breach this policy, MVDC is likely to request that you remove inappropriate content.

Furthermore, please note that a breach of this policy may lead to formal action under the Council’s Disciplinary Policy up to and including (in serious cases) dismissal.

**Policy Monitoring and Review**

This policy will be reviewed as required to ensure that it meets legal requirements and reflects good practice.

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| V1.0 | Final | February 2022 |  |  |
| V2.0 | Review | Due February 2025 | Policies to be reviewed at least every 3 years or in the event interim changes are needed (e.g. changes in legislation, work practices). | CS |