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# SOCIAL MEDIA & ONLINE USERS POLICY

# **Document Version Control**

Document	Social Media & Online Users Policy
Reference	2022NSP/Social Media & Online Users
Associated Policies and Documents	<ul> <li>The Education Act 2002, Section 175</li> <li>Preventing unsuitable people from working with children and young people – Circular No:34/2002</li> <li>Keeping learners safe - the role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002 (Guidance document 158/2015)</li> </ul>
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Headteacher	Rivilli

# **Equality Impact Assessment**

Name of Policy or Procedure	Social Media & Online Users Policy
Date of review/approval	September 2022
Those involved in the assessment	·
Protected characteristics unlikely to be impacted by the policy/procedure and reasons for drawing these conclusions (by reference to each characteristic or group of characteristics)  Protected characteristics which could be impacted by the policy/procedure i.e. there is the potential for having a negative differential impact – reasons for drawing	<ul> <li>Race</li> <li>Disability</li> <li>Gender/sex</li> <li>Sexual orientation</li> <li>Religion/belief</li> <li>Age</li> <li>Gender reassignment</li> <li>Pregnancy/maternity</li> <li>Marital status</li> <li>The policy sets out by the policy and procedures</li> <li>which the school follows to protect children from abuse. It recognises that some children, including those with disabilities, are especially vulnerable to abuse,</li> <li>The policy does not discriminate by reference to</li> <li>any of the protected characteristics</li> </ul> None
these conclusions by reference to each characteristic	
How the policy as reviewed/approved takes account of each characteristic for which there could be a negative differential impact – by reference to each of those characteristics	N/A
Recommended changes to mitigate against potential negative differential impacts	No changes recommended

The commentary highlighted in red above has been replicated in the policy to assist the reader in locating the commentary.

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# <u>Foreword – Purpose of the Policy</u>

This policy has been developed to protect Cardiff Council's reputation and brand by providing Council employees with a clear framework to work within to ensure effective, safe and legal use of social media. It aims to help get the most out of this powerful media tool to effectively promote the work and the vision of the Council.

This policy should be read together with other Council guidance in this area of work, including the **Communications Strategy**, Corporate Brand Guidelines, ICT Security policy (**5.IT.P.002**), Internet & Email policy (**5.IT.P.001**) and the Codes of Conduct (**5.C.014**).

It is important that all social media activity that relates to Council business is carried out within the context of this policy. Failure to comply with this policy may result in disciplinary action.

#### **Section 1 – Introduction to Social Media**

Social media is an umbrella term for websites and online tools, which allow people to interact with each other. This can include sharing information, pictures, videos, jokes, opinions, news, knowledge and interests.

When we say social media in this document, we mean any internet tools and sites used for communication.

Popular brands include:

- Twitter (microblogging)
- Facebook (social networking)
- YouTube (media video sharing)
- Instagram (image/video sharing).
- TikTok (Video sharing)

Used appropriately social media complements and enhances traditional communication channels and opens up new ways to engage with residents, stakeholders and partner organisations.

The benefits to the Council of using social media include:

 Engaging with more residents, service users, stakeholders and partner organisations quickly, providing 'real time' information

- Promoting the work of the Council, enhancing its reputation with its citizens and communities.
- Increasing awareness of events/campaigns/services/news.
- Ability to manage perception and expectation react quickly.
- Ability to be more open, transparent and accessible.
- The cost of sending a tweet or posting a comment is cost neutral.

It is important to remember that:

- Whilst deemed as an overall positive, information can be circulated around the world within seconds
- Once published it cannot be 'unpublished'
- Bad news travels further and faster
- The Council's reputation could be damaged
- It's our responsibility to ensure anything we publish does not breach GDPR legislation

#### **Section 2 – Audience**

This policy is to be used by anyone engaged in Cardiff Council business. It covers personal use of social media where the person identifies their link to Cardiff Council. It has been written to avoid any online interaction, which could be deemed to have a negative impact on service provision and the Council's reputation.

Any employee who engages in social media that could result in a negative impact on service provision or reputation could be subject to disciplinary procedures.

# <u>Section 3 – Instigation and Administration of Corporate Social Media Accounts</u>

You must not set up any new social media accounts for Cardiff Council business purposes without agreement of the relevant Director and permission from the Council's Monitoring Officer.

Any social media account that is created must be administered by designated accountable officers from the relevant Service as agreed upon agreement of the account. Designated officers will be responsible for managing content, monitoring the account, and setting and administering passwords to secure the account against unauthorised use. Usual good practice must apply in terms of using strong passwords, which are regularly changed.

Where it is not possible to have a corporate social media account with multiple login identities, it is recognised that for both practicality and continuity purposes, the

sharing of a single credential may be necessary. In such a case, it is the responsibility of the designated officer(s) to ensure that the credentials are still suitably protected and shared only with those who have genuine need. Under no circumstance should this be confused with the sharing of credentials for any other corporate system, which is still categorically prohibited.

Whenever an officer leaves the organisation or moves to a role, which no longer requires access to a corporate social media account, the password or other credential must be removed or changed immediately.

All administration, updates or management of content for any corporate social media page must be conducted from one of the Council's issued managed devices to ensure controls are in place for management of accounts.

# **Section 4 - Code of Conduct**

There are standards of behaviour expected of anyone representing Cardiff Council online. How you conduct yourself and the manner in which you address and respond to people is hugely important.

- **Be Professional.** You are an ambassador for the Council. Where appropriate disclose your position as a representative of your service area, department or team.
- **Be Responsible.** Always be honest and when you are made aware of information and trends in reaction share it with others where appropriate. Be upfront if you do not know something and need to find answers. Be realistic about timescales for response.
- **Be Open.** Be credible, accurate, fair and thorough and make sure you are doing the right thing. Be prepared to listen and allow people to speak and be heard.

**Get the T-Shirt:** A good rule of thumb is the T-Shirt example: If you wouldn't walk down the high street with a T-Shirt saying it for everyone to see – your boss, colleagues, family, residents, the police, journalists – don't post it!

Before and after publishing to social media:

- If in doubt, seek advice from your line manager or the Communications and Media team. (twitter@cardiff.gov.uk, 029 2087 3656)
- Follow the relevant Code of Conduct
- Respect copyright, fair use and financial disclosure laws
- Ensure that you follow the corporate brand guidelines

- Consider whether publicising your occupation may threaten the effectiveness with which you or your colleagues can do your job
- Make a clear distinction between social media activity for personal and work-related use. (See points 4 & 5) You will be held accountable for your work-related social media activity as well as personal use if it is deemed to have a negative impact on service provision or the Council's reputation.
- The content of any information or messages conveyed via social media must adhere to Cardiff Council's Equal Opportunities Policy. The Council has a duty under the Equality Act 2010 to promote equality and remove discrimination due to a person's age, disability, gender reassignment, race, religion and belief, sex, sexual orientation, marital or civil partnership status and pregnancy and maternity.
- Any information posted on social media sites that contravenes these duties could be seen as a breach of the Code of Conduct and your contract of employment.
- Read the terms and conditions of any sites you sign up to and make sure you are aware of who owns data posted on the site and what can be done with it.
- Be aware of the pace of social media. Messages can be posted, reposted and linked globally within seconds.
- Social network profiles are often not as private as people think be wary of venting work frustrations in comments you never know who may read them.
  - Bad news travels further faster! Even if you delete a post, it could still exist elsewhere online.

# Section 5 - Using social media in an official capacity

Whether writing on a social media site or for a Council page or profile you need to be clear about the purpose of your intentions and aware of your role as an ambassador for the organisation.

#### You must:

- Identify yourself and write in the first person. You are participating in an official capacity for Cardiff Council make this clear to your audience.
- As formal representatives of Cardiff Council you are personally responsible for the content you publish online.
- Do not publish content that could be deemed defamatory, discriminatory, in breach of copyright or data protection, or that could result in claims for damage.
   Refer to Codes of Conduct and the Council's Data Protection guidance.
- Never share confidential, personal or sensitive information.

- Consider your safety when posting personal information. For example, users probably do not need to know your home address or date of birth.
- Any content posted on behalf of Cardiff Council may attract media attention.
   Where part of a larger campaign, check with Communications and Media before proceeding. For advice on dealing with media enquiries please contact the Council's Press Office.
- If you publish content to any website related to the work you do or services associated with the Council, identify yourself. Give your name and your role.
- Respect your audience. Do not use discriminatory language or offensive terms, insults, obscenity, or engage in any conduct that would not be acceptable in the workplace. Refer to the Code of Conduct.
- Always show respect and consideration for the privacy of others and for topics
  that may be considered sensitive such as politics and religion. Everyone is entitled
  to express their opinions, balanced within the limits of freedom of speech laws
  and matters of equality. However, personal viewpoints that contravene our Equal
  Opportunities Policy and our legal duty to promote equality cannot, under any
  circumstances, be posted on social media sites on behalf of Cardiff Council.
- Do not pick fights, be the first to correct your mistakes, and do not alter previous posts without indicating that you have done so. Take responsibility and be transparent – you cannot hide anything online.
- Do everything possible to make sure information you post online is accurate and of a high quality.
- Social media activity on behalf of the Council should be valuable to target audiences and linked to identifiable business objectives. Add value by providing and sharing worthwhile information. Offer advice, guidance and relevant information to your audience.
- Social media activity on behalf of the Council should be, where it is practically
  possible, fully bilingual. As a general rule of thumb, any statements,
  announcements or pre-planned messages must be posted bilingually. If
  responding to an enquiry, it is acceptable to respond in the language in which
  contact was made.

# Section 6 - Using social media for Council campaigns

- All planned social media activity surrounding Cardiff Council should be discussed with the Communications and Media teams at the earliest opportunity, before any activity is undertaken.
- The Communications and Media team will provide help and guidance on identifying suitable channels for achieving campaign objectives to ensure social media is used effectively and appropriately. Social media projects will be managed in line with wider campaign activity.

- All channels run by the Council must meet the Council's equalities standards whilst complying with the organisation's policies.
- All channels run by the Council must comply with brand guidelines. Where possible, the official Cardiff Council logo must be published.
- All channels run by the Council must be fully bilingual.
- Unauthorised use of the corporate logo on social media sites may result in disciplinary action. Please contact the Council's Brand Manager for advice: jhennessy@cardiff.gov.uk
- Issues of maintenance and moderation of these channels must be discussed with the Communications and Media teams at the initial stage of project planning.
   Clear roles and responsibilities will be identified to ensure successful upkeep of the channel(s).
- Failure to maintain up to date campaign information, participation and engagement on social media sites will result in the channel being deleted.
- All activity should work to make sure the Council's online reputation is professional and effective.

#### Section 7 - Personal use of social media in work

- Refer to the ICT Security, Internet and email policy for information on using ICT equipment for personal use.
- Social media sites are public forums. Never assume any activity or content will remain private. Employees are responsible for checking privacy settings and understanding who can see published information.
- Consider your safety when posting personal information. For example, users do not need to know your home address or date of birth.
- Don't forget your day job. You must ensure your online activities do not interfere
  with your job, your colleagues or commitments to residents, stakeholders or
  partner organisations.
- Do not post offensive comments about the Council, its employees or Members.
   Refer to Code of Conduct.
- Do not publish content that could be deemed defamatory, discriminatory, in breach of copyright or data protection, or that could result in claims for damage. Even when using social media for personal use, you have a duty to adhere to the council's Equal Opportunities Policy. Please also refer to Code of Conduct and the Council's Data Protection guidance.
- Cardiff Council employees are personally responsible for the content they publish on blogs, wikis or any other form of user-generated media.
- If you publish, content to any website related to the work you do or services associated with the Council, identify yourself. Give your name and, if relevant,

- your role. Consider how publicising your occupation may affect your or your colleagues' work. If in doubt ask your manager.
- If it is inadvisable to discuss your work online, let your close friends and family know so they can avoid inadvertently saying something inappropriate.
- Write in the first person and make it clear that you are speaking for yourself and not on behalf of Cardiff Council. If you publish content to any website that has something to do with the work you do or services associated with the Council, use a disclaimer such as: "The views expressed here are my own and do not necessarily represent the views of my employer". However, any views that are in any way seen to have a negative impact on service provision or the reputation of the Council could have implications for the employee responsible.
- Never share confidential or sensitive information.
- Do not use the Council logo on personal web pages or within groups that do not comply with Council policies and codes of conducts.
- If you work in an area which could bring you into conflict with a member of the public we advise that you consider your privacy settings on social media. There are particular significant risks to your safety and security that can be managed if you are aware of the risks and act appropriately online. You should always be aware of the potential risk that an 'open' social media account may bring. Leaving settings open to all could allow people to see details of your private and family life. Think carefully before putting "Public" as an option in any of the drop-downs on social media channels.

# Section 8 - Monitoring and managing social media

# The Council's reputation

Social media allows anyone, anywhere, to write content about any topic they want. Consequently, it is likely you will find both positive and negative content about Cardiff Council and our services on social media sites.

- The Communications and Media team is responsible as far as possible for monitoring content on social media sites relating to Cardiff Council. For planned social media campaigns, the team will agree with service areas how activity will be managed.
- Using online tools and manual searches, the Communications and Media team and any other officers responsible will monitor content.
- It is not always necessary to engage with comments or content relating to the Council and its work.

• If you are concerned about any Council related content you find on a social media website, contact the Communications and Media team.

# **Employee use**

• ICT are responsible for managing employee use of social media on Council ICT equipment and during work hours. Please refer to ICT Security Policy and Internet and Email usage policy.

### **Section 9 - Misuse of Social Media**

You are responsible for any content that is placed by you on social media platforms, whether it is on your own account or a comment on any other account.

The misuse of social media can be categorised as content that could be deemed defamatory, discriminatory, in breach of copyright or data protection or that could result in claims for damage.

Any activity that is deemed a misuse of social media by Cardiff Council could lead to disciplinary procedures and ultimately result in you losing your job.

Basically, if you find yourself wondering if you can talk about something that you learned (or overheard) at work, DON'T.

# Remember: protect the Council, protect yourself!

# <u>Section 10 – Use of social media for information gathering/investigations of individuals</u>

Whilst the use of social media is not prohibited for the purpose of investigating or intelligence gathering on specific individuals who may be subject to criminal/civil investigation, staff must have due consideration to the Regulation of Investigatory Powers Act 2000 (RIPA), as amended by the Protections of Freedoms Act 2012. Staff must be aware that accessing an individual's social media account during a criminal investigation without their knowledge, even on one occasion, may constitute directed surveillance and therefore such activity would require formal authorisation in accordance with Cardiff Council's RIPA Policy.

Before commencing, any such activity staff should seek the necessary advice and guidance from their line manager or the Monitoring Officer.

# Section 11 - Policy review

This policy will be reviewed on an annual basis to keep pace with emerging trends and practices in social media usage and changes in legislation. The next review will take place in 2023.

Any changes due to legislative requirements will result in this policy being amended and re-issued.

The Communications and Media team is responsible for reviewing this policy.

#### **Section 12 - Social Media Checklist**

# 1. What are your objectives?

Before you start any social media activity, identify how it ties in with business objectives. Why are you using this channel? What outcomes would you like to see?

# 2. Think about your target audience

Will they find your content useful / informative?

# 3. See it through

If you set up an online profile, page, group or join a conversation make sure you maintain it. Before you start your activity, plan how you see it developing. If it's a short-lived campaign make sure you tie up loose ends when the campaign is over.

# 4. Review and evaluate

Consider how you will measure the success of your social media campaign / activity. Who will be responsible and how will you monitor and evaluate the effectiveness of the activity?

# 5. Get the right tone

Use plain language and an informal tone. Write in the first person.

# 6. Get your message across

Be clear, be concise, be accurate

# 7. Accountability

Be open and admit to any mistakes you make. You are personally responsible for the content you post online.

#### 8. Stick to the rules

Always comply with relevant Council policies and Codes of Conduct

# 9. Pause before you post

Anything you say will soon be widely available and could be around forever.

#### 10. Check GDPR

Does any of the content you are posting breach GDPR rules, are you releasing personal data you shouldn't? Check the background of photographs and videos. A recent breach saw people's names and addresses visible on a whiteboard in the background of a picture which breached GDPR rules.

# 11. Reputation management

Remember if you are using social media as a representative of the Council, you must protect and promote the Council's reputation.

# 12. Seek advice

If you are in doubt about posting content or have found content online that gives you cause for concern, please contact the Communications and Media team for advice.

# **APPENDIX**

# **Cardiff Council quick guidelines on using Twitter**

When engaging in activity on Twitter in a corporate capacity the following process and procedures MUST be adhered to:

- First and foremost, be polite and professional. Remember who you are representing. YOU are the voice of the Council.
- Maintain a conversational tone. Be human. Do not use over complicated corporate jargon.
- Be open and honest. If you do not know the answer to a request and need to find the answer then explain that to the user. Do not try to formulate a response unless you are 100% sure of its accuracy.
- React in a timely way. Social media moves fast, users expect a prompt response
  even if it is just an acknowledgement, .e.g. "Thank you for your enquiry, I will
  contact the relevant officers get back to you as soon as possible..."
- Be realistic about the level of information you can provide. For example, if someone is asking for something that the Police are better placed to answer do not be afraid to point the user towards them.
- ALL sent tweets MUST be related to Council services and initiatives and be of genuine value to the citizens of Cardiff. Do not send 'empty' tweets e.g. "hope you enjoyed your breakfast this morning". This will only devalue the account.
- If you choose to re-tweet someone else, ensure that the message is related to Council services or is of genuine value to your follower's safety and wellbeing. Be sure they are a credible source. Check their profile to see who they are and if they indirectly represent anyone.
- Under NO circumstances must any other elected member, political organisation or politically weighted account be followed, mentioned or re-tweeted.
- Personal opinions must not be voiced. Remember you are speaking on behalf of the Council, not yourself.
- Do not get drawn into arguments. Remain polite and professional throughout any engagement.

#### **IMPORTANT:**

If you are ever unsure about the impact of a tweet, whether it be the accuracy of the information contained or the risk of political bias, **DO NOT SEND IT!** 

If in doubt, check with your manager or contact the Council's communications manager.