

Title of Report:	ODHR Policies and Procedures – Social Media Policy
Committee Report Submitted To:	Corporate Policy and Resources Committee
Date of Meeting:	23 April 2024
For Decision or For Information	For Decision
To be discussed In Committee YES/NO	N/A

Linkage to Council Strategy (2021-25)	
Strategic Theme	Innovation and Transformation
Outcome	Improve Service Delivery
Lead Officer	Director of Corporate Services

Budgetary Considerations	
Cost of Proposal	n/a
Included in Current Year Estimates	n/a
Capital/Revenue	n/a
Code	n/a
Staffing Costs	n/a

Legal Considerations	
Input of Legal Services Required	YES/NO
Legal Opinion Obtained	YES/NO

Screening Requirements	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals.		
Section 75 Screening	Screening Completed:	Yes/No	Completed
	EQIA Required and Completed:	Yes/No	N/A
Rural Needs Assessment (RNA)	Screening Completed	Yes/No	Date:
	RNA Required and Completed:	Yes/No	Date:
Data Protection Impact Assessment (DPIA)	Screening Completed:	Yes/No	N/A
	DPIA Required and Completed:	Yes/No	N/A

1.0 Purpose of Report

The purpose of this report is to present Council with the Social Media Policy for consideration.

2.0 Background

2.1 The purpose of this policy is to provide clear guidance regarding the acceptable and responsible use of social media both within, and outside, of work. The policy aims to inform staff of their obligations with regard to the use of social media whilst minimising the risks of inappropriate use of social media to our business.

2.2 This policy provides advice and guidance to all staff members who are using (or considering using) social media in any capacity. It has been compiled to help staff understand the reputational, legal and ethical implications of engaging in online communication of this nature – and what can happen if social media is misused, whether intentionally or otherwise.

2.3 The purpose of this policy is to encourage and enable staff to use social media appropriately. It also makes clear our responsibilities to do so in accordance with the Code of Conduct and sets out the principles that staff are expected to follow when using social media in their personal and professional lives.

2.4 This policy covers the use of social media both in and out of work.

2.5 This policy applies to all Council employees, including the Chief Executive. It also includes apprentices, agency workers, casual workers and volunteers.

2.6 Third parties who have access to Council electronic communication systems and equipment, including consultants and contractors, are required to comply with this policy.

3.0 Consultation

3.1 The policy has been considered and agreed at the Senior Management Team and also the Trade Unions through the Action Group and Joint Consultative and Negotiating Committee (JCNC).

4.0 Equality Screening

- 4.1 In accordance with Council's duty under Section 75 Equality Legislation, the policies have been screened and the result is that they were screened "out".

5.0 Recommendation(s)

It is recommended that the Corporate Policy and Resources Committee recommends to Council the Social Media Policy for approval.



Social Media Policy

Policy Number	CCG/
Version Number	
Author	Head of ODHR

Screening Requirements			
Section 75 Screening	Screening Completed:	Yes/No	Date:
	EQIA Required and Completed:	Yes/No	Date:
Rural Needs Assessment (RNA)	Screening Completed	Yes/No	Date:
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1. INTRODUCTION

This policy is in place to provide clear guidance regarding the acceptable and responsible use of social media both within, and outside, of work. Council aims to inform staff of their obligations with regard to the use of social media whilst minimising the risks of inappropriate use of social media to our business.

This policy provides advice and guidance to all staff members who are using (or considering using) social media in any capacity. It has been compiled to help staff understand the reputational, legal and ethical implications of engaging in online communication of this nature – and what can happen if social media is misused, whether intentionally or otherwise.

If an employee has difficulty reading, hearing or if English is not the employee's first language, the content of any written information will be explained orally in a manner which will ensure the employee will understand. All written documents can be made available in other clear formats, such as large print, where necessary.

Outlined within this policy is a framework for managing social media within Causeway Coast and Glens Borough Council, including the roles and responsibilities of those involved in operating the policy.

Council recognises in this Social Media Policy, its obligation to meet the requirements of all relevant employment legislation and other legislation.

2. POLICY STATEMENT

Council acknowledges social media as a useful tool but recognises that it also needs careful management to ensure that social media is used effectively as part of a wider communications strategy and that this use does not expose Council or its staff to risk or harm, damage to reputation or services or to any breach of legislation.

Active engagement with social media presents real opportunities for Council to create effective dialogue with stakeholders, rate payers and service users, to listen to issues being raised as well as responding to queries and building awareness of roles and responsibilities.

Alongside other communications, social media can help to communicate, consult and engage in discussion or in formulating policy and practice; and be more transparent and accountable.

The purpose of this policy is to encourage and enable staff to use social media appropriately. It also makes clear our responsibilities to do so in accordance with the Code of Conduct and sets out the principles that staff are expected to follow when using social media in their personal and professional lives.

This policy covers the use of social media both in and out of work.

All staff who use social media are expected to adhere to the same standards of propriety as would be expected in any other public forum, be it during work or in their

own time. The simple rule to remember is that the principles covering the use of social and other digital media both at work and in a personal capacity are the same as those that apply for any other activity under the Code of Conduct.

The Code of Conduct for employees' states *'In general employees' private interests must not have the potential for allegations of impropriety or partiality which might bring the Council into disrepute. This includes standards of behaviour outside the working environment where the employee is known to be an employee of the Council. This also extends to the use of social media outside of work...'*

This policy may operate in conjunction with:

- Code of Conduct
- Data Protection Policy
- Dignity and Respect at Work Policy
- Safeguarding Adults Policy & Procedure; and
- Safeguarding Children Policy and Procedure.
- ICT Policies and Procedures

Any breach of this policy will be dealt with under Council's Disciplinary Policy.

This policy does not form part of an employee's contract of employment and Council may amend it at any time.

(The policy statement should be signed and dated as follows by relevant Council representatives and Council recognised Trade Union representatives).

Signed: _____ Date: _____

Mayor - Causeway Coast and Glens Borough Council

Signed: _____ Date: _____

Chief Executive - Causeway Coast and Glens Borough Council

3. POLICY SCOPE

- 3.1 This policy applies to all Council employees, including the Chief Executive. It also includes apprentices, agency workers, casual workers and volunteers.
- 3.2 Third parties who have access to Council electronic communication systems and equipment, including consultants and contractors, are required to comply with this policy.
- 3.3 Councillors should refer to the Northern Ireland Local Government Code of Conduct for Councillors [here](#) and Northern Ireland Local Government Commissioner for Standards Guidance for Councillors on Social Media and the Code of Conduct which are available from the Member's Portal [here](#).

4. GENERAL PRINCIPLES

- 4.1 The Policy applies to the use of social media whether during office hours or otherwise that may affect the Council in any way.
- 4.2 The policy applies whether the social media channels are accessed using Council IT facilities and equipment or, via personal equipment.
- 4.3 To ensure social media and digital communications are used in an appropriate manner and in line with Council policies.
- 4.4 To ensure it is understood that when using social media and digital communications in either a work or personal capacity the same standards are expected as in any other public forum. That is, adhere to the standards of behaviour as set out in the Code of Conduct.

5. DEFINITIONS

Social Media - any type of online platform or website that enables people to communicate. The term social media is used to describe online forums, tools, websites and interactive media which enables users to interact with each other by sharing information, opinions, knowledge, images and interests. There are several types of social media that Council use now, or may use in the future, and this policy covers all types, for example:

- Social networking (Facebook, LinkedIn, Google+)
- Microblogging (Twitter/X, Tumblr, including personal blogs and comments on other blogs)
- Photo sharing (Instagram, Snapchat, Pinterest)
- Video sharing (YouTube, Facebook Live, Periscope, Vimeo, [Tiktok](#))
- Direct or group messaging apps or platforms (Mobile text messages, WhatsApp, Facebook Messenger, MS Teams)
- Online encyclopaedias (Wikipedia, Sidewiki)

This list is not exhaustive.

6. ROLES AND RESPONSIBILITIES

This section outlines the roles and responsibilities in relation to the policy.

6.1 Employees (all those identified within the scope of this Policy as detailed in Section 3.1 and 3.2) have responsibility to:

- Comply with this policy and should ensure that they take the time to read and understand it, adhere to the requirements described and ensure that their use of social media involving reference to the Council does not damage the reputation of the organisation.

6.2 Line Managers have responsibility to:

- Ensure effective implementation of this policy.
- Ensure that their employees are given the opportunity to read and fully understand the policy and are aware of the standards of behaviour expected.
- Ensure the policy is consistently applied.
- Ensure that the policy is adhered to, and may review and investigate the appropriate use of social media that takes place in or outside of working hours where a complaint or concern has been raised or identified.
- Managers are not expected to monitor social media use from their team members but are expected to support in identifying breaches and handling complaints in relation to this policy, escalating concerns to ODHR as required.

6.3 ICT Team have a responsibility to:

- Assist in review and investigation of complaints or concerns in relation to Council IT facilities and equipment.

6.4 ODHR have a responsibility to:

- Oversee the implementation of the policy.
- Monitor and review the operation of this policy and make recommendations for change to minimise risks.
- Communicate the policy throughout the Council.
- Provide advice and guidance in relation to any alleged breaches of this policy and support any subsequent process as a result.

7 GUIDANCE FOR SOCIAL MEDIA USE AT WORK AND OUTSIDE OF WORK

7.1 Use of social media should be conducted in line with Council policy, ensuring that both work and personal social media use will not adversely affect Council, its business or employees, be damaging to Council's reputation, credibility or otherwise violate any Council policy or relevant legislation.

- 7.2** Personal use of social media should not be conducted on Council computers, devices, networks and other IT resources and communications systems. If a concern is identified or a complaint is raised regarding personal use of social media on Council equipment, this may need to be reviewed and investigated.
- 7.3** When making personal use of social media, (i.e., you are not posting in your capacity as a Council employee) you must not state or imply that you are posting on behalf of the Council, or as an employee of the Council. You must not use your position in Council to post comments/information in a personal capacity about business-related matters.
- 7.4** Should anyone not expressly name Council as their employer on social media, this policy will still apply if a connection with their employment can reasonably be made.
- 7.5** Be respectful to others when making any statement on social media and be aware that you are personally responsible for all communications which will be published on the internet for anyone to see. On personal social networks and messaging services—even closed ones like Facebook and WhatsApp – you should be aware that posts can be shared outside of your network. If you make a posting which could bring the organisation into disrepute, then you could be subject to disciplinary action.
- 7.6** If you have an external business based social media account this should be completely separate and distinct from your role in Council.
- 7.7** For social media sites or applications which are solely work or professionally based, such as LinkedIn or professional networking forums, you are permitted to state that you work for the Council, and the capacity of your employment. Before doing so, you should consider if this is relevant or necessary, and if there are any security implications of doing so. For example, if you are involved in high priority investigations/legal matters/enforcement etc it may not be advisable to provide details of your role. Further advice is available from Data Protection Manager/ODHR. Where your social media accounts are for personal use only, you do not need to say that you work for the Council.
- 7.8** The privacy settings on social media apps and websites should give you control over how your personal information is used. Employees who use social media are advised to check their privacy settings before using a particular service and to review them regularly, particularly after any new settings are introduced.
- 7.9** The following conditions are in place for personal use of social media:
- Personal use of Social Media should not be conducted on Council computers, devices, networks and other IT resources and communications systems.
 - Personal social media use must not interfere with work productivity or Council commitments and requirements.
 - Personal social media accounts or posts which are likely to harm the reputation of Council should be avoided. This applies to commentary on Council policy, services or directly on Council as an employer.

- Where an employee's personal social media profile identifies their association with the Council, care must be taken when posting content. Council may also be liable for the actions of those whose comments on content on social media in a private capacity are closely connected to the work environment. As a result, anyone found to breach this restriction will be subject to disciplinary policy.

7.10 Employees are personally responsible for personal communications on social media outside of the workplace, for example at home, in their own time via their own personal equipment. Employees should remain mindful of social media contributions and what is disclosed/commented upon in relation to Council, its employees, functions or services.

7.11 In accordance with this policy, both work related and personal social media use must adhere to the following general rules:

- You must not make any social media communications that could damage the Council's interests or reputation, whether directly or indirectly.
- Do not upload, post, like, forward or post links to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content.
- You must not use social media to defame or disparage the Council, our employees or any third party; to harass, bully or unlawfully discriminate against employees or any third parties; to make false or misleading statements; to directly or indirectly make derogatory comments or use offensive or inappropriate language in any social media communication; or to impersonate colleagues or third parties. Anyone who does so is personally liable for their use of social media and could be subject to litigation on a personal basis as a result.
- Do not post messages, status updates or links to material or content that is inappropriate. Inappropriate content includes, but is not limited to, pornography, racial or religious slurs, gender-specific comments, information encouraging criminal activity or terrorism, or materials relating to cults, gambling or illegal substances. This definition covers any text, images or other media that could reasonably offend someone based on race, age, sex, religious or political belief, national origin, disability, sexual orientation or any other protected characteristic.
- Do not use social media for any illegal or criminal activities.
- Do not broadcast unsolicited views on social, political or religious matters.
- Do not use social media for advertising or endorsement purposes.
- Do not disclose commercially sensitive, anti-competitive, private or confidential information such as information which is discussed in committee, within confidential meetings or is protected under data protection legislation.
- Be mindful of and maintain professional boundaries with children and adults at risk of harm in line with relevant Council Safeguarding policies.
- Do not use personal social media accounts to control or administer Council social media channels unless expressly authorised to do so.

- When using social media for personal use, use a disclaimer, for example: ‘the views expressed are my own and don’t reflect the views of my employer’. Be aware though that even if it is clear that views on such topics do not represent those of Council, comments could still be damaging to other employees and/or to Council.
- If affiliation as an employee/worker/contractor/volunteer etc of Council has been disclosed, ensure that profiles and any content posted are consistent with the behaviour and conduct expected in the Code of Conduct to be displayed toward colleagues and service users. This may include content that is ‘liked’ or ‘shared’ which suggests approval of that content.
- Do not post material in breach of copyright or other intellectual property rights.
- Do not disclose any information, which is not yet in the public domain.
- Be mindful of the impact any contribution might have on people’s feelings and/or to people’s perceptions of Council.
- Be aware that social media postings can be in the public domain for many years, and once published, may be manipulated without consent or further distributed.
- Carefully consider the acceptance of ‘friend requests’ from service users, their families or others i.e., contractors, elected members. These requests should only be accepted where there is no risk of real or perceived conflict of interest. (Refer to Conflicts of Interest Policy for further details on Conflicts of Interest.)
- You must not express opinions or provide advice on behalf of the Council via social media, unless expressly authorised to do so by your manager. You may be required to undergo training in order to obtain such authorisation.
- You should not provide opinions or advice on social media in a personal capacity on matters which relate to the Council’s responsibilities.

This list is not exhaustive.

8. CONCERNS REGARDING SOCIAL MEDIA

- 8.1** An employee who feels that they have been harassed and / or bullied by material posted onto a social media platform by a colleague should refer to the Dignity & Respect at Work Policy (a copy of which is available on the Staff Portal or available from line managers or ODHR).
- 8.2** If an employee identifies a potentially inappropriate use of social media by another employee which could be in breach of this policy, this should be reported to their line manager.
- 8.3** Any manager who becomes aware of alleged inappropriate social media activity should speak with the OD/HR as soon as possible. The manager should also refer to the Dignity at Work Policy and take appropriate steps in line with that policy.

9. REFERENCES

- 9.1** Staff should never provide professional or character references for other individuals on social media or professional networking sites, as such references, positive and negative, can be attributed to the organisation and create legal liability for both the author of the reference and the organisation.

10. MONITORING USE OF SOCIAL MEDIA

- 10.1** The content of Council IT resources and communication systems remain Council property. Employees should be aware that any message, file, data, document, facsimile, telephone conversation, social media post or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on Council electronic information and communications systems will be discoverable. Council equipment will not be routinely monitored, however employees should be aware that where a complaint or concern is raised or identified, an investigation may be instigated which warrants a review of Council systems as identified. In such circumstances it may be necessary for ICT to access Council property such as phones or laptops.

For further information, please refer to ICT Policies and Procedures .

- 10.2** Employees should be aware that staff use of and input to social media platforms/tools (whether accessed for work purposes or not) may be reviewed and investigated and, where breaches of this policy are found, action may be taken under Council's Disciplinary Policy, up to and including dismissal.
- 10.3** Council reserves the right to restrict or prevent access to certain websites.

11. MISUSE OF SOCIAL MEDIA/BREACH OF THIS POLICY

- 11.1** Misuse of social media can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal liability against the user and Council.
- 11.2** Where it is believed that an employee has failed to comply with this policy, the matter will be dealt with under Council's Disciplinary Policy. If after investigation, an employee is found to have breached the Social Media Policy and/or any other associated policy as a result, they will be subject to disciplinary action which may include sanction up to and including to dismissal.
- 11.3** The sanction applied will depend on factors such as:
- The seriousness of the breach.
 - The nature of the posting.
 - How widely the posting was read and/or shared.
 - The impact it has had on the organisation and or the individual(s) concerned.
 - Whether the comments cause problems given the employee's role.
 - Whether the employer can be identified by the postings.

- 11.4** Dependent on the nature of comments or alleged breaches of the policy, if online activities are considered to breach Council's Social Media Policy, in the first instance Council may require you to remove content that, in the reasonable opinion of Council, breaches the policy. Serious breaches and/or failure to comply with such a request may result in investigation leading to disciplinary action.

12 DATA PROTECTION ISSUES

Council employees must be aware of their obligations under the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR) at all times including use of social media.

Personal data only includes information relating to natural persons who:

- can be identified or who are identifiable, directly from the information in question; or
- who can be indirectly identified from that information in combination with other information.

Data protection legislation requires that you must have a valid lawful basis in order to process personal data. Processing means taking **any action** with someone's personal data. Therefore employees must not share personal information, such as private addresses, phone numbers, email addresses or other online contact details on social media without ensuring they have a lawful basis to do so. It should be noted that this is not an exhaustive list. Always seek advice from the Data Protection Officer if in doubt.

Employees must also be alert to their duty of confidentiality to Council and to treat information of a private and confidential nature accordingly. For example, information discussed during an 'in committee' session of Council is confidential until determined otherwise. Again, if in doubt employees should seek guidance from the Data Protection Officer.

13. CUSTOMER COMPLAINTS

Where a complaint or issue is raised via a social media channel managed and controlled by the Council, the Council will explain that complaints are not received via social media channels and the complainant will be advised on the correct method to raise a complaint.

14. EVALUATION AND REVIEW OF THE POLICY

The Policy will be reviewed on a regular basis to ensure that it meets the needs of Council and to ensure compliance with relevant legislation. If required, the Policy will be reviewed in conjunction with Council recognised Trade Unions.

15. SECTION 75 EQUALITY AND GOOD RELATIONS

Council is fully committed to meeting its obligations in relation to Equality and Good Relations under Section 75 of the Northern Ireland Act. This policy will be screened

using Section 75 guidelines and will be subject to an Equality Impact Assessment if found necessary as a result of the screening process.

16. CONTACT DETAILS

Any issues or queries relating to this policy should be addressed to:

Head of ODHR
Causeway Coast and Glens Borough Council
Cloonavin
66 Portstewart Road
COLERAINE
BT49 1EY

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Frequently Asked Questions

Can I declare on social media that I work for the Council?

Yes, if it is a professional based social media platform, but ensure you reflect a professional view of yourself and the organisation in all your postings. You should be aware of the ability of people to connect your work role to other social media which you use on a personal basis. However, there is unlikely to be a need for you to say you work at the Council on personal social networking sites. If you declare you are an employee of the Council, even if a personal account must do in line with Councils Code of Conduct.

What happens if I make a mistake when using social media?

How Council deals with particular mistakes will depend on the nature of the error and the connection to your work. You should always inform your line manager if you are at all unsure whether you have made a mistake on social media that may affect the Council or its business and reputation. Your conduct online is subject to the same disciplinary rules and the expectations of the staff Code of Conduct as your offline conduct.

However, immediate steps you could take are:

- Delete the post and apologise for the mistake, explaining the material was posted by mistake.
- Inform your line manager
- Contact the Council's Data Protection Officer if you are concerns regarding a data breach

Will the Council actively search social media for information posted by members of staff on their personal accounts?

No, unless information has been received that would require further investigation because it breaches Council rules or standards of conduct.

What should I do if a colleague is sending me unwanted messages or posting disparaging messages about me on non-work related social media pages?

Any employee who feels that they have been harassed or bullied or are offended by material posted or uploaded by a colleague onto a social media website should inform their line manager who will then discuss the issue with ODHR. Support and advice is available from ODHR, and The Employee Assistance Programme, Inspire.

Why is the Council concerned about things I might post on social media in a personal capacity?

Boundaries between corporate life and private life can become blurred when using social media and as such employee's actions and posts have the ability to affect the organisations

reputation. It is important that employees are aware of the impact their posts could have on the Council and should therefore use social media responsibly. The Code of Conduct for employees' states *'In general employees' private interests must not have the potential for allegations of impropriety or partiality which might bring the Council into disrepute. This includes standards of behaviour outside the working environment where the employee is known to be an employee of the Council. This also extends to the use of social media outside of work...'*

Are messages received via WhatsApp, Messenger and similar applications covered by this policy?

In principle all forms of social media and digital communication are covered by this policy. This includes WhatsApp, Messenger etc. and indeed any new forms of social media or digital communication that may be introduced or become popular in the future. It is correct that in these instances only the sender and receiver(s) can see the content. However, the content can in principle be widely distributed if it is transferred into other social media platforms. The fact that the content may be private, would not excuse otherwise unacceptable or inappropriate behaviour such as the sharing of derogatory or discriminatory comments about colleagues or third parties.

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