

STRONGER together



Lewes District Council



Working in partnership with **Eastbourne Homes**

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1.0 Introduction

- 1.1 Social media is an important communication and engagement tool for the councils. We have highly active corporate Twitter and Facebook accounts, which we use to communicate what the councils and our partners are doing as well as specific profiles for service areas such as Tourism, LDC Housing, EHL, and corporate LinkedIn and YouTube accounts. Unlike traditional media, which goes out from one source to many receivers, social media involves many sources reaching many receivers. It has changed the way individuals and organisations communicate and now social media is very much part of the mainstream.

By developing our use of social media we are responding to customer demand and helping shift customers to engage with us via online channels. This policy sets out a process for the limited and authorised use of social media and guidelines for how it can be managed effectively.

- 1.2 The councils' reputation is dependent on the behaviour of its employees, and everything we publish reflects on how the councils are perceived.

Social media must be used in a way that adds value to the councils' business; i.e. encouraging engagement with our services online; solving problems; enhancing the councils' services, processes and policies; creating a sense of community; supporting our partners; or helping to promote the councils' aims and values.

Social media sites run by individual customers can provide useful intelligence to officers working in counter-fraud, regulatory services and debt recovery, but researching a person's social media presence could amount to unlawful interference with their privacy unless pre-authorised in line with the councils' separate policy on the use of the internet (including social media sites) for research and/or investigation purposes. **See section 4** below for more about this.

- 1.3 This policy provides a structured approach to using social media. It aims to ensure that use of social media is effective, lawful, does not compromise our information or computer systems/networks and that our reputation is not adversely affected.

- 1.4 This policy applies to all officers and contractors who are granted access to the councils' social media channels.

Only those officers and contractors who have been authorised to use business social media accounts should do so and only from Lewes District and Eastbourne Councils' equipment

2.0 Scope

- 2.1 This policy covers use of social media where the content, information, or services are being provided by the councils.

The Social Media Guidelines (Appendix 1) will help account holders and users to get the best out of the tools available whilst maintaining a professional environment and protecting themselves and the councils from reputational risk.

- 2.2 It also extends to participation on social media sites not managed by the councils where:

- Contributions are posted directly in a professional capacity (such as contributing to a professional forum)
- a contribution is made by someone who identifies themselves as an employee or any other person working on the councils' behalf.

Guidelines in Personal Use of Social Media (appendix 2) will help users of personal social media accounts ensure that your social network account does not compromise your professional position or put the councils' at reputational risk.

3.0 Responsibilities

- 3.1 The corporate social media accounts will be managed by Business Strategy and Performance (BSP) working in close partnership with Customer First.

The Customer Communications and Engagement Lead will be responsible for approving the creation of new social media accounts. To request a new social media account please email BSP@lewes-eastbourne.gov.uk in the first instance.

- 3.2 A record of approved business social media account users will be maintained by ICT. This record will detail the post holders, their roles and the specific accounts they can access.
- 3.3 The BSP team will monitor the use of social media to ensure compliance with the councils' policies and guidelines.
- 3.4 Managers have a duty to ensure that their teams comply with this policy and the relevant guidelines.
- 3.5 Officers using social media must be aware of and comply with this policy and other related council policies.
- 3.6 No officer may access social media via a council device until authorised to do so. To request authorisation, officers must complete the 'Online Social Networking for Business Purposes – Access Request Form' and pass it to their Head of Service for approval. If the request is granted, ICT will enable the officer's online account to access the appropriate sites.

4.0 Use of social media to carry out research on or investigations into individual customers

- 4.1 Any officer wishing to carry out checks, research or an investigation into a resident, tenant or sole trader business by viewing social media sites created by or relating to that person must consider whether the officer's online activity risks interfering with the person's right to privacy. Interference that cannot be justified on the grounds of public safety, the prevention or detection of crime or the protection of health is likely to be **unlawful**. Even where privacy interference satisfies those criteria, it must be proportionate to the anticipated benefits in operational terms.
- 4.2 Officers must also guard against research or investigations being done in such a way as to constitute 'surveillance', as this kind of activity may require special authorisation in advance.
- 4.3 To mitigate the risks associated with paragraphs 4.1 and 4.2, officers should read and adhere to the councils' separate policy and guidance on internet / social media research and investigations, which can be found on The Hub.

5.0 Social media and safeguarding

- 5.1 Social media users must not use the accounts to private message with children or vulnerable adults who use council services. This includes family members, carers or friends of clients. Requests should be politely declined explaining that it is against council policy, which is designed to protect staff and the public from any misunderstandings.
- 5.2 From time to time, you may become aware of material or information posted on social media sites or through other communication channels, which causes concern about the safety of vulnerable users. In these circumstances you have a duty to report these concerns and follow the appropriate safeguarding procedures which are available on the Hub.
- 5.3 Images of children and young people who are clearly identifiable, should not be used without written permission of parents or carers and the purpose of the photograph and how it will be used has been explained.
- 5.4 When taking images or photographs of vulnerable adults the Mental Capacity Act 2005 should be considered. This is a legal framework which protects people who may lack capacity to make decisions for themselves. Mental capacity and the person's ability to give informed consent should be taken into account. This should be referred to the councils' Senior Officer for Safeguarding. This information is available on the Hub.
- 5.5 Photos/videos should always respect and reflect the personal dignity of the individual(s).

6.0 Social media and emergency response

- 6.1 In an emergency members of the public using social media are now often the first to report from the scene of an incident, before traditional news media. This is why it is so important for us to be ready to make full use of social media in an emergency situation both to monitor what has already been said and to communicate with our residents.
- 6.2 We must be quick to respond with factual information, as agreed by silver command, within the first 20 minutes of an incident. We must also resist making knee jerk responses to comments or criticism. All posts must be purely factual, providing correct information and working together with our partner services, as swiftly as possible.
- 6.3 In an emergency we may need to extend our social media coverage outside of usual working hours to enable us to provide residents with the latest safety information. If so, we will make it clear what these extended hours are, and if we stop coverage, e.g. overnight, to state this clearly and inform people when coverage will start again.
- 6.4 In an emergency there will be a designated responder(s) appointed by the Customer Communication and Engagement Lead and the Head of Customer and Neighbourhood Services.

7.0 Service Level Agreement

- 7.1 We will clearly state our opening hours on our social media accounts. If these hours change for any reason we will alert our followers as soon as possible.
- 7.2 During working hours, all queries directed at the councils' social media accounts will receive an initial response within 90 minutes unless otherwise stated. There will be times that it would not be appropriate to respond to questions or comments and if a user is in any doubt they should contact the Customer Communications and Engagement Lead, or Head of Customer and Neighbourhood Services.
- 7.3 All the social media accounts will be monitored during Customer First's opening hours. These hours will be clearly stated on the account page.
- 7.4 Our corporate accounts will be updated daily. This is to maintain the accounts and may be with information on or the promotion of services, updates on work being done by the councils or events taking place in which the councils are involved.

Other accounts will be updated only with relevant content which will determine the frequency of these updates.

8.0 Comment Monitoring

- 8.1 We will monitor all comments posted to our social media sites and reserve the right to remove inappropriate comments including those that have obscene language or sexual content, threaten or defame any person or organisation, or are party political, promote illegal activity or promote or endorse any commercial product, service or company.
- 8.2 Where anyone persists in posting inappropriate comments, we will send out two warnings before blocking them. Where this is necessary, it will be the Customer Communications and Engagement Lead who blocks the user and they will also keep a log of the inappropriate content and how it has been dealt with.
- 8.3 We do not want to censor open debate and comments that are not deemed inappropriate according to the above criteria should not be deleted, even if they are not to our liking. There may be exceptions such as posts containing inaccurate information which remain visible after a lengthy period and which have nothing to do with the councils but may have a reputational consequence.

9.0 Complaints and FOI requests

- 9.1 If an official complaint is received via social media, we should acknowledge this but would still require the resident to submit their complaint through the correct channels on the councils' website in order to have sufficient information for the complaint to be acted upon.
- 9.2 What is said on a social media platform (and indeed on other platforms such as text messages or private email accounts), even if the message is made private, may be subject to access legislation such as FOI.
- 9.3 FOI requests may be made through our social media accounts. Users must be aware of this and treat them accordingly.

10.0 Adverts and endorsements

10.1 We will not publish posts that are party political, or promote, endorse or link to any commercial product, service or company.

Where we work in partnership with external organisations, separate agreements will be made on how we use social media in these instances.

11.0 Breaches of policy

- 11.1 Misuse of social media or breaches of this policy may lead to access being withdrawn and disciplinary action under the councils' disciplinary procedure.
- 11.2 Serious breaches of this policy, for example, social media activity causing serious damage to the councils, may constitute gross misconduct and may lead to disciplinary action up to and including dismissal.
- 11.3 Breaches could also lead to fines being issued and possible criminal or civil action being taken against the councils or the individual(s) involved.

Appendix 1 – Social media guidelines

1.0 Why do we need guidelines for professional use?

- 1.1 These guidelines are for those who are using social media in a professional capacity on behalf of the councils.

When you use social media professionally you are writing on behalf of the councils. These guidelines are written to assist you and ensure a corporate style across our social media accounts.

2.0 What should you say and how should you say it?

- 2.1 Good communication with residents is about being informative – open, honest and two-way.

- 2.2 Remember when posting on social media:

- Be polite.
- Write as if you were talking to a customer on the phone. Don't be too formal but don't use text-speak. Unlike speaking to a customer on the phone however, use their first name if you know it.
- Write from the point of view of the page or stream. Use "We" and "Our" rather than "I"
- Always sign a response with your name
- Keep posts brief

3.0 When should you say it?

- 3.1 Social media sites require moderation. This involves monitoring, managing and responding to any comments published by other users on a particular page or account. This needs to be undertaken on a regular basis and plans will need to be put in place to ensure this is done effectively.

- 3.2 Nominated users will regularly post content, read all replies, direct messages and comments and ensure that any emerging themes or helpful suggestions are passed to the appropriate team.

4.0 When should you reply?

- 4.1 You should reply to comments directed at your stream or on your page as soon as possible and definitely within 90 minutes.

- 4.2 If you need to get clarification on something from another team tell the customer. Say something like "We need to ask the Neighbourhood First team about this, we'll get back to you" to let the customer know you've seen their comment or request.

- 4.3 Ensure you respond appropriately to annoyed or disgruntled customers.

How you respond is vital. It is a positive thing that people care enough to enter into a discussion.

- Respond as quickly as possible.
- Respectfully correct inaccurate information.
- Explain how you are going to handle the situation.

- Don't ignore it or delete it

5.0 When should you remove a comment?

- 5.1 Do not remove a comment. Instead refer any comments that contain obscene language or sexual content, threaten or defame any person or organisation, or are party political, promote illegal activity or promote or endorse any commercial product, service or company to your manager or the Customer Communications and Engagement Lead.

6.0 When should you share a comment?

- 6.1 If you see positive content on another page or profile that's relevant to yours, particularly if it's one managed by the council then re-tweet or share it on your page or profile.

7.0 Emergency or crisis situations

- 7.1 During an emergency or crisis people actively look to social media for information that will help them build situation awareness and make decisions.

The usual practice in a crisis or emergency is that all information and update messages will be agreed by a member of the BSP Team before updates are communicated.

8.0 Role of Cobb PR

- 8.1 Cobb PR is the communications agency used by the councils. The agency provides advice and guidance in:

- Matters where support is required in managing our reputation
- Specific strategic communication campaigns

The agency will liaise with the Chief Executive and/or Directors when there is a crisis or emergency to ensure consistent messages are communicated.

- 8.2 Refer any comments from the press or relating to the press to Cobb PR.

9.0 Conclusion

- 9.1 Using social media successfully in a professionally capacity is a mixture of good customer service practice and common sense.

- 9.2 In any correspondence using social media if you are unclear as to how to proceed please contact your manager or team leader.

Appendix 2 – Guidelines in personal use of social media

1.0 Guidelines

- 1.1 How you behave online can have an impact on you professionally as well as personally. If you use social networks you must not make any comments which could bring the council into disrepute.

Be mindful that any online activities/comments made in a public domain, must be compatible with your position within the councils, and safeguard yourself in a professional capacity.

- 1.2 You need to be aware that the information you post on your personal social media profile can make you identifiable to customers, as well as people you know in a private capacity.
- 1.3 Protect your own privacy. To ensure that your social network account does not compromise your professional position, ensure that your privacy settings are set correctly.
- 1.4 Anything that is posted outside work using social media, including comments, photos, images and video material does not remain private and so can have an effect on or have work-related implications. Therefore, comments made through social media, which you may intend to be “private” could leave you open to scrutiny from the public and could affect your own professional reputation and that of the council and may be in contravention of the Code of Conduct or the Dignity at Work Policy.

Once something is online, it can be copied and redistributed making it easy to lose control of. Presume everything you post online will be permanent and can be shared.

- 1.5 Do not discuss the council, your work, clients, partner organisations or the people you work with on social networks.

Even when remarks about colleagues are anonymised, these are likely to be inappropriate and could be deemed as bullying and/or harassment.

Discussions on social networks should not be considered private, even in a forum with restricted access (such as on someone’s Facebook wall). It is not the same as having an offline discussion among friends or a one-to-one email conversation. Social networks are designed to make sharing as easy as possible, so anything you say may be circulated to a wider audience and could be brought to the attention of council colleagues, councillors and customers.

- 1.6 Give serious consideration about accepting a friend request from a person you believe could be a customer or may conflict with your employment.
- 1.7 As a general measure to protect your personal safety and identity, you are advised not to accept friend requests from people who are not personally known to you.

- 1.8 Social media sites are not fully secure even if the privacy setting is 'private'. Any content posted could be shared by a 'friend' and may be seen by people other than the intended audience. If the information and/or images shared are considered offensive, it could result in a complaint about you to the councils as your employer.
- 1.9 When setting up your profile online consider whether it is appropriate for you to include a photograph, or provide occupation, employer or work location details.
- 1.10 You can take action if you find yourself the target of complaints or abuse on social networking sites. Most sites will include mechanisms to report abusive activity and provide support for users who are subject to abuse by others.
- 1.11 If you find inappropriate references and/or images of you posted by a 'friend' online you should contact them and the site to have the material removed.