



Social Media Policy for Loughton Town Council (LTC)

1. Introduction

This policy covers the business use for social media within LTC, promoting LTC services, news feed and links to LTC This policy applies to all employees and elected Members

Social Media is the collective term of online communications channels dedicated to community-based input, interaction, content-sharing and collaboration. Websites and applications dedicated to forums, blogging, *microblogging*, social networking, social bookmarking, *social curation* and *wikis* are among the different types of social media. You may know them as Facebook, Twitter, Instagram etc. However, as most sharing of personal information is currently via Facebook, you will find that some of the guidance material tends to lean towards this site.

Social media involves building, online communities or networks which encourage participation, dialogue and involvement.

LTC would benefit from taking a more innovative approach to communication with people, which can lead to greater involvement with residents, increased efficiencies and enhancement of LTC reputation. It could also help us to engage with the harder to reach groups like the younger population. Rather than waiting for individuals or groups to approach the Council, social media offers the opportunity of being able to connect to the community, listen to what people are saying and engage with them on equal footing, focussing on two way communications, rather than simply delivering messages. It may empower local residents to speak up about their needs and influence decision making, in turn building trust and stronger bonds in general

2. Purpose and Aim of Policy

Generally LTC needs to set clear guidelines for using social media sites to

- ensure they are used effectively and that their use does not expose LTC to security risks or reputational damage
- regulate the use of social media by officers and members

Specifically to

- promote LTC based services
- preserve and protect and the reputation of LTC across all digital platforms.
- ensure that LTC is not brought into legal disrepute through affiliation with controversial digital platforms.
- clarify the guidance to employees and councillor as to their use of social media within their professional capacity.
- give guidance to employees and councillors on potential legal issues arising from use of social media.
- adopt and maintain a consistent corporate in the use of social media
- ensure that LTC information remain secure and is not compromised through the use of social media.

LTC has developed a Social Media Policy to guide employees and councillors on when and how to use social media. The policy provides clear guidance on the process of setting up a social media account for business purposes and promoting LTC Services.

Users creating accounts on social networking sites usually find that their postings are open to everyone unless security settings are applied. Information posted without security restrictions is sometimes referred to as being in the 'public domain'. However, this does not mean because we can see it, we can use it, view or monitor it for business purposes

Anything that appears on a LTC social media channel reflects on the Council and its reputation, but given the relaxed style of social media, it is important not to be overly formal. All spelling and grammar should be accurate. "Text speak " is acceptable to some audiences but should be avoided wherever possible.

If you have any queries, in the first instance please contact the Town Clerk.

3. Responsibilities of LTC Officers, LTC Members, Representatives / Terms of use

- Use social media sensibly and responsibly. Be civil, tasteful and relevant. Do not use racist, sexist or inflammatory language on the social web or engage in any conduct which would not be acceptable in the workplace.
- Do not post any message that might be construed as likely to cause harassment, alarm or distress.
- Be aware of the key legal pitfalls that can arise when publishing on such platforms
- Social Media networking applications must not be used for party political purposes or specific campaigning purposes as LTC is not permitted to publish material which 'in whole or part appears to affect public support for a political party' (LGA 1986)
- The use of social media must not breach LTC's misconduct, equal opportunities or bullying and harassment policies.
- Remember you are personally responsible for the content you publish on any form of social media
- Never give out personal details such as home address and telephone numbers Ensure you handle any personal or sensitive information in line with LTC's data protection policies. Be aware if safeguarding issues as social media sites are often misused by offenders.
- Respect copyright, fair use and financial disclosure laws.
- Social media sites are in the public domain and it is important to ensure that you are confident about the nature of the information you publish. Permission must be sought if you wish to publish or report in meetings or discussions which are meant to be private or which are meant to be private or internal to LTC. Don't cite or reference customers partners or suppliers without their approval.
- Where individuals from partner organisations are involved and are acting on behalf of LTC, they will be expected to sign and agree to the terms outlined in this Social Media Policy.
- Be careful to log out of LTC social media accounts once the task at hand is complete, or the end of your working day, to prevent accidental posting.
- Officers must identify themselves as being part of LTC and only permitted to use LTC email addresses and not personal ones.

- If an officer receives any threats, abuse or harassment from members of the public through their use of social media, they must report such incidents to the Town Clerk.
- Members should act in accordance with the Members Code of Conduct, which outlines key information and guidance on best practice issues such as information handling and security, whilst engaging in their official capacity. Members should think about what they say and how it is said, in just the same way as you must when making statements in person or in writing
- Members must also think about whether you are seen to be, or give the impression that you acting in your official capacity as a councillor

4. **Some other risks**

If Social Media is used incorrectly, even for a very good reason, we may be in breach of a number of laws including Regulation of Investigatory Powers Act (RIPA) and Human Rights, privacy, libel and copyright. This may cause us to be fined, become liable for civil damages and costs, suffer reputational risk and potentially cause service users harm or distress. Note that where privacy or confidentiality is concerned, it is the intrusive behaviour that causes the breach, as well as any subsequent use of the information obtained. You must be able to justify the intrusion before it is actioned.

If we don't carefully evidence, assess and review the information we are gathering, there could potentially be breaches in the Data Protection Act 1998, potential fines, reputational risk and potentially cause service users harm or distress.

You must never use your personal social media account to undertake business on behalf of LTC

If you fail to follow the Social Media Policy LTC may take disciplinary action against you.

5. **Other Considerations**

Your online persona

Whether you are using social media for professional or personal purpose, you need to be aware that the content is available to anyone who knows how to search for it.

Think about how and what you say might affect the way others view you and consider who you interact with. Key points are :-

- If you criticise work or colleagues, think about who might see it and how it might be perceived
- Be aware that social media content can turn up in Google searches
- Remember that once something is live on a social network, or on a mobile platform of any kind, it can be shared and sent worldwide, to anyone.

The pre-election period (referred to as 'Purdah') also includes social media

During a pre-election period councillors and officers need to be additionally aware of any material that could be posted that might be deemed to publicise one political party over another as defined in the Local Government Publicity guidelines. This could include the use of stock images, retweets, favouriting tweets, page likes and comments.

Additional care should also be taken in respect to replying to posts and getting involved in social media conversations that could be deemed to have a political or controversial nature. If you are unsure always check with the Town Clerk.

The DCLG recommended code of practice for local government publicity states:

“During the period between the notice of an election and the election itself, local authorities should not publish any publicity on controversial issues or report views or proposals in such a way that identifies them with any individual members or groups of members.

Publicity relating to individuals involved directly in the election should not be published by local authorities during this period unless expressly authorised by or under statute. It is permissible for local authorities to publish factual information which identifies the names, wards and parties of candidates at elections.

Laws when using Social Media

The notes below briefly explain some of the laws that can be broken using social media. It is not an exhaustive list.

Often the best advice when trying to avoid problems on social media is simply to use common sense. However, ignorance of the law is not an excuse for breaking it and those using LTC social media accounts need to be aware of these potential dangers.

If you have any worries about something you are about to post, or have already posted seek guidance from the Town Clerk.

Defamation

Defamation law protects the reputation of individuals and corporations.

Defamation covers two civil wrongs, or torts – libel, which is defamation in print, online or broadcast, and slanders, which is defamation by spoken word. Libel is far more common and more of a threat to LTC as an organisation than is slander.

Defamation is punished by damages (cash) set by the court and awarded to the claimant. Even where cases are settled before court action it can be extremely expensive. Individuals and companies can sue for defamation.

Defamatory meaning covers any suggestion of criminal activity, dishonesty, fraud, hypocrisy, immorally, lack of professionalism, incompetence, failing in a duty, sexual impropriety and bullying.

A claimant now has to show that their reputation has been seriously harmed by what has been published about them. Recent cases suggest that a prompt, prominent apology for defamation can undo the harm of a libellous publication. This is something that must be dealt with by LTC Town Clerk along with appropriate legal assistance. It does mean that any complaint which mentions libel or threat of a libel action MUST be reported to the Town Clerk immediately.

Repetition Rule

It is important to note that it is not a defence to say that you are just repeating what others have said. The rule in defamation is that anyone who repeats a libel has a liability for it. This is particularly true of sharing (this includes liking on Facebook and re-tweeting on Twitter or any other form of social media endorsement).

Malicious falsehood

This is another civil wrong related to defamation, but slightly different. You commit a malicious falsehood if you recklessly publish something about someone, which is false and causes them damage.

For example, you might say someone has retired, or they are dead, when they are neither. Both suggestions are not defamatory, but if they are not true they could have a serious impact on the claimant's livelihood.

The claimant has to show that what has been said is false; caused them loss and that it was made maliciously, i.e. a failure to check properly.

Copyright

The presence of material online does not make it copyright free. It is in public, but not public domain. But this makes it very easy to copy.

Personal Social Media Accounts

Many members of staff will have a number of personal social media accounts.

You must never use your personal social media account for LTC business purposes.

If you do have such accounts, please note the following points.

1. Your personal account should not give readers/followers/friends the impression that you are speaking for the authority, or stating council policy.
2. If on your biography, or in your posts, you make it know that you are a council employee, please indicate a disclaimer in your blog which makes it clear that any views expressed there are personal and do not state council policy.
3. Even with such a disclaimer in place, please be aware that should you post material that is racist, discriminatory, or otherwise legally actionable, this could still result in disciplinary action being taken. A guide to the most frequent legal risks is included in this policy document.
4. Closed or private accounts can still be copied and screenshotted to allow wider distribution, so care must be taken even if you believe you are the only posting to a very small number of people. Be particularly careful on live accounts such as Snapchat and Facebook Live where content is instantly streamed to followers. There is a potential for breaches of client privacy here and careful consideration should be given to whether they should be used at all during working hours.
5. If you mention your work in any social media posts, please take care not to jeopardise the privacy and confidentiality of members of the public, your colleagues or the authority itself.

6. If you repeat the posts of others – Retweets, sharing posts etc. – please be careful that the content does not contravene any of the above items.
7. If people contact you on your social media account to complain about LTC, or make inquiries about LTC actions or policies please refer them to correct information channels rather than engaging them on your own social media platform.
8. If your social media account is targeted by ‘trolling’ or other anti-social behaviour, because of your position within the council, please report the matter to the Town Clerk.
9. If you believe a post that you have made inadvertently contravened any of the above guidelines, please take it offline and seek advice from the Town Clerk/Line Manager in order to minimise the risk of damage.

Can Officers use their personal social media account whilst at work

Yes but only during breaks and before and after their working day starts and finishes. Officers must never use their personal social media account to undertake business on behalf of LTC.

Tips for councillors on using social media

- Identify your audiences, connect with relevant groups
- Conversations are two-way, listen and encourage comments - views on council policies
- Know what people are saying and respond where appropriate – if you receive a negative comment DEAL with it IMMEDIATELY
- Find your voice and personality, but be careful with and avoid ‘extremist’ views and opinions
- Correct your own mistakes
- Offer worthwhile information - Residents will be interested in your work in the community
- Think before posting - Use common sense
- Talk to residents, staff and others and do answer their questions - quickly and honestly
- Be responsible at all times
- Be respectful at all times
- Innovate – different approaches work for different people
- Have a personality – corporate speak or just issuing press releases do not work well on social media

- Share other people's helpful content and links
- Credit other people's work, ideas and links
- Listen - social media is designed to be a two-way channel, just like any good conversation
- Ask your own questions
- Seek feedback from your residents - but make sure you share the results with them
- Learn from others – there is rich learning of good practice social media use across local government via organisations such as the LGA

Stay on topic

- And more than anything, do use social media in the spirit in which it is intended – to engage, openly and honestly

PB/MS 8.7.19

Footnote:

Microblogging meaning the activity or practice of making short, frequent posts to a microblog.

Social curation meaning is collaborative sharing of Web content organized around one or more particular themes or topics.

Wikis a website or database developed collaboratively by a community of users, allowing any user to add and edit content.