



## FOREST ROW PARISH COUNCIL SOCIAL MEDIA POLICY (updated 12<sup>th</sup> January 2021)

### 1. Introduction

Social media have allowed people to communicate with each other in online environments. This allows them to share interests; information or friends ([Facebook](#), [YouTube](#), [Instagram](#), [TikTok](#) and [Twitter](#) being examples). Social media are now frequently utilised by businesses and government organisations to promote their messages, events and products, depending on the rules of the particular social media tool.

#### Social media tools include:

- [Social networking sites](#)
- [Video and photo sharing websites like TikTok, Reddit and YouTube](#)
- [Micro-blogging sites like Twitter](#)
- [Weblogs, including personal blogs or blogs hosted by traditional media publications](#)
- [Forums and discussion boards](#)
- [Online encyclopaedias such as Wikipedia](#)
- [Web sites that allow individual users or companies to use publishing tools e.g. Comments on news sites](#)

### 2. Purpose

The purpose of this policy is to ensure: -

- that the Council is not exposed to legal and governance risks;
- that the reputation of the Council is not adversely affected;
- that our users are able to clearly distinguish where information provided via social networking applications is legitimately representative of the Council.

In addition, the purpose of this Social Media Policy is to guide Parish Council employees (including permanent, temporary and casual employees as well as volunteers and contractors to Council) and Councillors on the use of social media in the following ways:

- For work purposes (e.g. promoting events, news, projects etc) when issues refer to Council or statements are being made on Council's behalf;
- For personal use when making references to Council, its Councillors or staff or any other Council-related issue or subject;

### 3. Scope

This policy covers the use of social networking applications by Council employees, Elected and Co-Opted Members and by partners or other third parties (including contractors) on behalf of the Council. These groups are referred to collectively as 'Council representatives' for brevity.

The requirements of this policy apply to all uses of social networking applications which are used for any Council-related purpose and regardless of whether the applications are hosted corporately or not. They must also be considered where Council representatives are contributing in an official capacity to social networking applications provided by external organisations.

Social networking applications and uses include, but are not limited to:

- Facebook (general posts)
- Facebook groups and forums (whether public or private)
- YouTube (general posts)
- YouTube groups and forums (whether public or private)
- Instagram (general posts)
- Instagram groups and forums (whether public or private)
- TikTok (general posts)
- TikTok groups and forums (whether public or private)
- Twitter (general posts)
- Twitter groups and forums (whether public or private)
- Special interest forums
- Political party, campaigning or movement/activist forums

All Council representatives should bear in mind that information they share through social networking applications, even if they are on private spaces, are still subject to copyright, data protection and Freedom of Information legislation, the Safeguarding Vulnerable Groups Act 2006 and other legislation including recent GDPR regulations. They must also operate in line with the Council's Equality and Diversity Policy.

**Note: The Policy does NOT apply to personal use when no reference or inference is made to Council, Councillors, related issues or its staff.**

**Use of social networking applications in work time for personal use only is not addressed by this policy.**

#### **4. Council's use of social media**

The use of social media by Council to achieve its business aims will be overseen by the Finance & Policy Committee. This committee will be responsible for delegating authority to a restricted number of social media administrators within Council.

Employees and Councillors, when using social media must not use their office, whether as employees or as councillors, to express their own opinions in such a way that any reasonable person could interpret such opinions as those of the council, a council committee, sub-committee or council working group.

## 5. Guidelines for delegated social media administrators are as follows:

- a) Social media administrators may only comment on topics within their own area of responsibility and only if they have delegated authority to do so.
- b) Social media administrators should ensure any Council related content that is published, is factually accurate and compliant with FRPC policies and management directives (e.g. on confidentiality, privacy and copyright).
- c) Social media administrators should not reveal confidential or commercially sensitive information about FRPC and only disclose publicly available information.
- d) **If an employee or councillor receives an unwanted or threatening comment or approach in social media during the course of working** at. Or representing, FRPC, for example, from a disgruntled customer or parishioner, they must report it to the Town Clerk in writing immediately, who in turn will report this to the next F&P committee.
- e) On-line published material from the public will not be treated as formal correspondence with FRPC. For example, if a member of the public had a formal request, comment or enquiry, a complaint against Council, Council staff or Councillors or a response to an item for community consultation they would be asked to contact Council in writing or via a phone call to the Council offices in order that the issue can be recorded in the official system.
- f) A Disclaimer advising users of this policy will be included on all Council social media sites.

## 6. Terms of Use

Social networking applications: -

- a) Must not be used to publish any content which may result in actions for defamation, discrimination, breaches of copyright, data protection or other claims for damages. This includes but is not limited to material of an illegal, sexual or offensive nature that may bring the Council into disrepute.
- b) must not be used for party political purposes or specific campaigning purposes as the Council is not permitted to publish material which 'in whole or part appears to affect public support for a political party' (LGA 1986)
- c) Must not be used for the promotion of personal financial interests, commercial ventures or personal campaigns.
- d) Must not be used in an abusive or hateful manner.
- e) Must not be used for actions that would put Council representatives in breach of Council codes of conduct or policies relating to Elected Members or staff.
- f) Must not breach the Council's equality and diversity or bullying and harassment policies. Where individuals from partner organisations are involved and are acting on behalf of the Council, they will also be expected to comply with the relevant Council policies.
- g) It is also important to ensure that members of the public and other users of online services know when a social networking application is being used for official Council purposes.

**To assist with this, all Council representatives must adhere to the following requirements:**

- a) They must only use @forestrow.gov email addresses for user accounts which will be used for official Council purposes.
- b) Where social networking applications are being managed by Council representatives, appropriate feedback and complaints information must be published in a prominent place which is easily accessible to other users.
- c) The use of the Council's logo and other branding elements should be used where appropriate to indicate the **Council's support and agreed representation**. The logo should not be used on social networking applications which are unrelated to or are not representative of the Council's official position.
- d) Council representatives should identify themselves as such where appropriate on social networking applications. For example, through providing additional information in user profiles.
- e) Council representatives should ensure that any contributions they make are professional and uphold the reputation of the Council.
- f) Council representatives must not promote or comment on political / activism issues that may be regarded as such.
- g) All users need to be aware that applications may be closed for a defined period before local and national elections in order to comply with legislation

## **7. Personal Use of social media sites - general guidelines**

FRPC recognises that Council employees and Councillors may wish to use social media in their personal lives. The Policy does not intend to discourage nor unduly limit personal expression or online activities. However, users should recognise the potential for damage to be caused (either directly or indirectly) to the **Council in certain circumstances via personal use of social media when the user can be identified – or chooses to be identified - as a Forest Row Parish Council representative**. Accordingly, users should comply with this policy to ensure that the risk of such damage is minimised.

Users are personally responsible for the content published in a personal capacity on any form of social media platform. It is, therefore, important that employees and Councillors note the following issues.

- a) Blog, Twitter posts, site comments etc remain permanently accessible. Tracking tools can identify the contents of a website at a particular date and via ISP addresses, even if the contents are later deleted.
- b) A search of an organisation's name will produce a full list of any blogged comments about that organisation, so that anyone with internet access can find them.
- c) Similarly, a search using an email address or individual name will produce a full list of comments and other material made from that address or attributed to that individual.
- d) Personal revelations and comments, embarrassing photos, etc, that are accessible to current and prospective employers may be detrimental to a person's career prospects, depending on the context.
- e) Be aware of privacy settings and preferences to restrict access to content.

## **8. Council representatives' use of social media**

Whilst council representatives' access to and use of the above tools outside the course of employment / Council is a private matter for the employee and Councillor, issues may arise where FRPC is mentioned on-line or where it is possible to link employees and Councillors with their employment at FRPC or as representatives of FRPC.

### **In such cases, the following rules apply:**

- a. Do not mix the professional and personal issues in ways that are likely to compromise the interests and reputation of FRPC
- b. Do not imply FRPC endorsement of your personal views
- c. **Social media should not be used to lobby or influence opinion as a result of disagreements with voting decisions taken in council**
- d. **Staff and councillors should not discuss council business or contribute to online discussions related to council business without agreement from the F&P committee or a nominated social media administrator**
- e. Staff and Councillors should be aware of the laws covering libel, defamation, privacy and the protection of intellectual property
- f. Staff and Councillors should familiarise themselves with Council's Code of Conduct.
- g. Activities on social media may be subject to the requirements of the Code of Conduct.
- h. Staff who are identified as an employee of FRPC and Councillors, and **who** post comments or pictures on social media that negatively impact FRPC's reputation or brand and who can be identified as a Member or employee of FRPC, may be subject to disciplinary action.

## **9. Records Management**

Material published on Council's official social media sites must be recorded and stored in compliance with the Council's Records Management Policy and Procedures. Where information is disseminated using multiple channels, eg Website, YouTube, Blogs etc, a record of where this information is stored should be kept. The particular social media administrator is responsible for the identification of record material and the proper archiving of that material within the council's record systems.

## **10. Non-Compliance Statement**

Non-compliance with this Social Media Policy may have the potential to damage the reputation, image, competitive or financial position of FRPC, and consequently, may result in disciplinary action. This may include termination of employment in serious cases and in accordance with Council's Policies and Procedures. Employees / Councillors who breach the law may also be personally liable for their actions.

## **11. Enforcement**

Any breach of the terms set out above could result in the application or offending content being removed in accordance with the published complaints procedure and the publishing rights of the responsible Council representative being suspended.

The Council reserves the right to require the closure of any applications or removal of content published by Council representatives which may adversely affect the reputation of the Council or put it at risk of legal action.

**Any communications or content you publish that causes damage to the Council, any of its employees or any third party's reputation may amount to misconduct or gross misconduct to which the Council's Dismissal and Disciplinary Policies apply.**

**'In summary, no social media posts by staff or councillors may discuss matters relating to council business - in any form - without the express consent of a social media administrator. Any posts or direct messages requesting comments or clarification from staff or councillors should be directed to the social media administrator who will respond, if such a response is considered to be appropriate, within 72 hours or three working days of being informed of the post or request. No discussion or debate should be entered into by staff or councillors in any private capacity that implies they are speaking as representatives or as staff of the parish council. If there is any doubt, please follow the above guidance. Any breach of this policy will be considered a disciplinary matter and will be addressed to the Personnel Committee.'**

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