



ADUR & WORTHING  
COUNCILS

Joint Governance Committee  
31 July 2018  
Agenda Item 12

Key Decision /No

Ward(s) Affected: All

**Social Media Policy - updating the Councils' approach**

**Report by the Monitoring Officer**

**Executive Summary**

**1. Purpose**

- 1.1. Since its inception 20 years ago, social media has rapidly transformed the way individuals and organisations interact with each other, providing a voice for those who weren't being heard before and additional platforms for promotion.
- 1.2. With technology constantly and quickly evolving, the Councils has a duty to regularly review its policy around social media.
- 1.3. This updated Social Media Policy will give clear guidance on when and how it should be used by staff and members in professional and personal capacities.
- 1.4. This will ensure the organisation can make best use of these technologies and so improve the way it does business.
- 1.5. It will also ensure staff and members know where they stand when it comes to social media, making them aware of their responsibility to comply with good practice and the law; while protecting the Councils brand and reputation.

## **2. Recommendations**

- 2.1. Consider the updated Social Media Policy included in Appendix A.
- 2.2. Recommend the adoption of the updated social media policy to each Council for adoption and to form part of each Council's constitution.

## **3. Context**

- 3.1. Social media is the creation and sharing of information, ideas, interests and other forms of expression via virtual communities and networks.
- 3.2. Since the inception of social media in the late 1990s and early 2000s it has become widespread, attracting billions of users worldwide and becoming part of everyday life for many people across the globe. This means the lines between personal and professional use can become blurred.
- 3.3. Social media includes, but is not limited to, blogs; wikis; RSS feeds; social networking sites such as Facebook, LinkedIn and Twitter; photo sharing sites such as Flickr; and video sharing sites such as YouTube.
- 3.4. The widespread availability and use of social networking applications brings opportunities for the Councils, Members and its Officers to better understand, engage and communicate with its customers, partner agencies and the communities it serves.
- 3.5. However, if social media is misused by representatives of the Councils (either corporately or by individuals) it could cause severe reputational and legal issues for the Councils and also for individuals. There are also potential safeguarding risks.
- 3.6. The Councils currently has a range of 'official' social media channels. It is through these that the majority of the Councils social media messaging is published.
  - 3.6.1. The Councils' main publishing channels are Facebook and Twitter. There is also a presence on LinkedIn and Youtube.
  - 3.6.2. Social media used to communicate news and updates from the council and the wider community to residents. It is also now an

important customer service tool, allowing resident queries to be answered quickly and directly.

- 3.6.3. The accounts are monitored collaboratively by the Communications team and the Customer Contact Centre.
- 3.6.4. Engagement and reach across both main channels continue to increase across both channels, with the Councils regularly reaching an audience of more than 60,000 individuals every week.
- 3.7. As well as the main corporate accounts, a number of individuals and Members also have their own 'corporate' social media accounts, making them clearly identifiable as representatives of Adur & Worthing Councils.
- 3.8. Personal use of social media by Officers and Members in their own names and in their own time is also widespread. On occasions, some individuals use these personal accounts to comment on Council matters.
- 3.9. To avoid misuse, a Social Media Policy provides clear guidance on when and how Officers and Members should use various platforms in both professional and personal capacities. It should be noted that there may be circumstances when, despite using a personal account, an Officer or Member may be acting within the scope of their Code of Conduct and other Council policies.

#### **4. Issues for consideration**

- 4.1. The Councils' current Social Media Policy was introduced in January 2016. Since then a number of factors have changed.
  - 4.1.1. The very nature of social media as an online, engaging and interactive tool means that it is constantly evolving to meet user demands. To ensure the Councils' approach remains relevant and up-to-date, it is good practice to regularly review its policy.
  - 4.1.2. The Councils' Communications team has also changed in that time, moving to a 'newsroom style' storytelling operation. As part of that, the use of social media has been reassessed - with the majority of activity now directed through the main Adur &

Worthing Councils accounts rather than numerous accounts with small followings. The refreshed policy takes this new approach into account and lays down formal guidelines for all Councils users.

- 4.2. This updated policy supports the Councils' stated purpose, ambition and values by enabling the organisation to make best use of these technologies. This can then improve the way it does business.
- 4.3. It also sets out a behavioural framework for Officers and Members to ensure that the considerable benefits that accrue from using social media are adequately balanced against our legal responsibilities and the need to safeguard the Council's image and reputation.
- 4.4. The new Social Media Policy also recognises that many of the issues facing Officers and the same as those facing Members. Rather than create and publish two separate policies, the revised document brings guidance together into one place.
- 4.5. The alternative to adopting this new revised policy is that the older version remains. However, as this is not aligned to either new technology or the Councils' wider communications approach, it risks becoming a redundant document.

## **5. Engagement and Communication**

- 5.1. Engagement with Officers and Members around any Social Media Policy is essential to its adoption.
- 5.2. Before this revised Social Media Policy was presented to Members, discussions were had with both HR and legal colleagues. Feedback from informal discussions with Officers and Members around wider social media use was also used to develop the Policy.
- 5.3. If Members decide to adopt the revised policy, then a range of steps will be taken to update Officers and Members of the guidelines. This will include articles in internal newsletters, an easy-to-understand guide on the intranet and presentations to managers.

## 6. Financial Implications

- 6.1 There are no direct financial implications arising from the approval of this policy.

## 7. Legal Implications

- 7.1 Article 11, paragraph 11.03 of the Council's constitutions sets out the Functions of the Monitoring Officer and provides an authority for the Monitoring Officer to make 'minor and consequential amendments to the Constitution at any time'. This Policy has made significant and fundamental changes to the Policy and proposes a joint Policy for Officers and Members and therefore cannot be adopted under delegated powers.
- 7.2 The Joint Governance Committee within its terms of reference has the responsibility to monitor and review the operation of the Constitution to ensure that its aims and principles are given full effect.
- 7.3 Article 14.03 of the Constitution provides that changes to the Constitution will only be approved by the Council after consideration of the proposal by the Joint Governance Committee.

### Background Papers

- The [Councils' current Social Media Policy for staff](#) was adopted in January 2016.
- Adur District Council and Worthing Borough Council Constitutions

### Officer Contact Details:-

Mike Gilson

Head of Communications

07909 688132

[Mike.Gilson@adur-worthing.gov.uk](mailto:Mike.Gilson@adur-worthing.gov.uk)

## **Sustainability & Risk Assessment**

### **1. Economic**

1.1. Matter considered and no issues identified

### **2. Social**

#### **2.1. Social Value**

2.1.1. A particular focus of Platforms for our Places, the Councils' three year programme, is how to build capacity within our communities and community partners to enable them to shape and lead our places.

2.1.2. Social media and its online communities carry a strong and influential voice, which can be positive and negative. By creating an effective and efficient policy the Councils can understand, engage and communicate with its customers, partner agencies and the communities it serves.

2.1.3. Effective social media use can minimise the risk of misplaced or malicious allegations being made against those who work with vulnerable groups, inside and outside of the Councils.

2.1.4. Effective communication on social media by staff and elected members can also help support partners' work while ensuring their message is spread to a wider audience.

#### **2.2. Equality Issues**

2.2.1. Matter considered and no issues identified

#### **2.3. Community Safety Issues (Section 17)**

2.3.1. Good online communication, in conjunction with partners, has the potential to spread important messages and appeals which could reduce crime and disorder across our communities.

2.3.2. A failure to provide relevant guidance to staff and councillors could lead to a direct impact on crime and disorder, such as misinformation around vulnerable or minority groups being spread widely; and the sharing of potentially sensitive safeguarding information.

## **2.4. Human Rights Issues**

2.4.1. An often used defence of social media is that it falls under the right of freedom of speech. The Councils also recognise that staff and members have a right to a personal life.

2.4.2. The policy aims to strike a balance by issuing guidance which upholds these rights while ensuring various laws are complied with while the reputation of the Council is upheld.

## **3. Environmental**

3.1. Matter considered and no issues identified

## **4. Governance**

4.1. This report provides Joint Governance Committee details why a revised Social Media Policy is required.

4.2. The presentation of this report and proposed recommendations to refer it to both respective Full Councils ensure that there requires approval from members before this approach is adopted.



---

## **SOCIAL MEDIA POLICY FOR MEMBERS AND OFFICERS**

---

### **1. INTRODUCTION**

- 1.1. Social Media includes the various online technology tools that enable people to communicate easily via the internet to share information and resources. Social media includes, but is not limited to, blogs; wikis; RSS feeds; social networking sites such as Facebook, LinkedIn and Twitter; photo sharing sites such as Flickr, Instagram and Snapchat; and video sharing sites such as YouTube.
- 1.2. The widespread availability and use of social networking applications brings opportunities for the Councils to better understand, engage and communicate with its customers, partner agencies and the communities it serves.
- 1.3. This Policy supports the Councils' stated purpose, ambition and values by enabling the organisation to make best use of these technologies and so improve the way it does business. It also sets out a behavioural framework for Officers and Members to ensure that the considerable benefits that accrue from using social media are adequately balanced against our legal responsibilities and the need to safeguard the Councils' image and reputation.

### **2. PURPOSE AND OBJECTIVES**

- 2.1. The purpose of this policy is to:
  - ensure Officers are aware of their responsibility to comply with good practice and the law for example in relation to data protection, confidentiality, libel, copyright, safeguarding of children and vulnerable adults, human rights, harassment and discrimination so that the Councils are not exposed to legal and governance risks;
  - support safer working practice by setting standards of good practice and behaviour in the use of social media;
  - ensure the reputation of the Councils and its Officers are not damaged;
  - ensure children, young people and vulnerable adults are safeguarded by reducing the risk of positions of trust being abused or misused;
  - minimise the risk of misplaced or malicious allegations being made against those who work with vulnerable groups;
  - ensure users of social networking media are able to clearly identify where information provided via such applications is legitimately representative of the Councils;
  - enable Officers to distinguish between the use of social media in their work and personal lives;
  - ensure the use of social media is aligned to the Council's corporate communications approach.

### **3. OTHER CODES AND POLICIES**

- 3.1. The Councils' Code of Conduct for Officers applies to all offline and online communications and includes the use of social media, and can in some circumstances apply to the use of social media in an Officer's personal life..
- 3.2. The Councils' Disciplinary Policy applies to online communications and includes the use of social media, and can in some circumstances apply to the use of social media in an Officer's personal life.
- 3.3. The Council's Code of Conduct for Elected Members applies to a Member's use of Social Media.

#### **4. USE OF SOCIAL MEDIA BY ADUR & WORTHING COUNCIL OFFICERS**

- 4.1. Social media is used to communicate news and updates from the Council and the wider community and residents. It is also now an important customer service tool. The two main channels used are Facebook and Twitter.
- 4.2. There is also a Council presence on LinkedIn and Youtube.
- 4.3. The majority of public facing communication via the Councils' corporate social media channels should be either produced or approved by the Council's Communications Team.
- 4.4. Some individual Councils accounts or aspects of social media management, such as incoming customer enquiries, can be operated by other members of staff. However, this is only by prior approval of the Head of Communications and after full training delivered by the Communications team is completed.
- 4.5. A Council service can request to create a public social media page by submitting a business case outlining how social media would benefit this service and how it will be maintained or managed. This should be submitted for review to the Head of Communications.
- 4.6. If approved, the social media pages will be set up in collaboration with the Communications team and all design must be in line with the Councils branding.
- 4.7. All new social media pages will be reviewed after a period of 4 months. Those sites which are not performing well or are not benefiting residents will be removed. Similarly, any unauthorised sites will be closed down. Contact the Head of Communications for more information.
- 4.8. Officers may be permitted to use a Councils Twitter account to represent their role within the local authority. These must:
  - Be requested and approved by the Head of Communications;
  - Be clearly identifiable as a corporate account using @nameAWC
  - Include the relevant Adur/Worthing/Joint logo in the header or profile image

#### **5. PERSONAL USE OF SOCIAL MEDIA - OFFICERS AND MEMBERS**

- 5.1. Social Media is now part of everyday life and routine and the lines between personal/ professional use can become blurred.
- 5.2. Officers and Members must be aware that their actions online on their personal pages may have wider implications on their professional role and on the Councils' image/representation. Always bear your relevant Code of Conduct in mind when you post to social media.

- 5.3. In the event that an officer/member's online conduct impacted on the Councils this would become a matter of council concern and may result in investigation in accordance with the council's Disciplinary Procedure.
- 5.4. All Officers and Members should familiarise themselves with the privacy settings of each social media platform they are using and ensure these are set up correctly. You should never include any personal information (DOB, phone number, address etc) on your personal profile, nor should you share this with residents or third parties.
- 5.5. Never publish confidential information which you have received as part of your job. Nor should you use any such information for personal gain or pass it on to others who may use it in such a way.
- 5.6. Staff should be aware not use personal online profiles to raise or discuss a complaint or grievance about the Council, your manager, colleagues etc. There are formal procedures in place for progressing these within the Council.

## **6. DATA PROTECTION AND SUBJECT ACCESS REQUESTS**

- 6.1. As per section 5.5, to adhere to the latest data protection laws you should never share any sensitive or personal information to social media about a colleague, Member or resident. Any instances of this will be investigated and may lead to disciplinary action.
- 6.2. Members of the public can submit a Subject Access Request (SAR) via our corporate social media pages. The right of access, commonly referred to as subject access, gives individuals the right to obtain a copy of their personal data as well as other supplementary information.
- 6.3. More information about an SAR can be found here:  
<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>

## **7. MEMBER CODE OF CONDUCT**

- 7.1. Members should be very careful in respect of their actions on their personal pages as the Member Code of Conduct may apply to them when they are not expecting it.
- 7.2. Elected and Co-opted Members are bound by the provisions of their Code of Conduct for Members when they are conducting Council business or acting, claiming to act, or giving the impression of so acting, as a representative of the Council, or in their official capacity as a Councillor. However, the law has held that whether a Councillor uses a personal social media or email account or a Councillor one is not definitive, and neither is whether he/she signs off or refers to themselves as a Councillor or not (*MC v Standards Committee of LB of Richmond 2011*).

## **8. LINKED DOCUMENTS**

- 8.1. There are a number of policies which should be considered in conjunction with this social media policy. These can all be found on the Councils' Intranet, or hard copies can be provided on request. These are:
  - The Councils' IT Policy
  - The Councils' Disciplinary Policy
  - The Councils' Use of Social Media in Investigation Policy
  - The Councils' Officer Code of Conduct (see intranet)
  - The Adur District Council Members Code of Conduct

- The Worthing Borough Council Members Code of Conduct