



ONCHAN DISTRICT COMMISSIONERS

Aim: To provide clear guidance regarding the acceptable use of social media both within, and outside of work.

POLICY AND PROCEDURES

SOCIAL MEDIA POLICY AND MEMBER BLOGS

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Contents

1. INTRODUCTION 3

2. UNDERSTANDING THE RISKS OF SOCIAL MEDIA 3

3. ACCEPTABLE USE AND MONITORING SOCIAL MEDIA 4

4. OFFICIAL COMMUNICATIONS 4

5. SOCIAL MEDIA FOR WORK USE 5

6. YOUR PERSONAL USE OF SOCIAL MEDIA..... 5

 6.1 Blog Sites.....6

7. USE OF SOCIAL MEDIA AT WORK 6

8. SAFETY 6

9. INFORMATION PROTECTION..... 6

10. THE ACCEPTABLE USE OF SOCIAL MEDIA BY CUSTOMERS AND RESIDENTS 7

 10.1 WHAT IS AND ISN'T ACCEPTABLE7

 10.2 HOW WE WILL DEAL WITH UNACCEPTABLE BEHAVIOUR7

11. DATA PROTECTION ACT..... 8

Policy Review - History:

Please be aware that a hard copy of this document may not be the latest available version, which is available in the Authority's document management system, and which supersedes all previous versions.

Those to whom this policy applies are responsible for familiarising themselves periodically with the latest version and for complying with policy requirements at all times.

Effective from:	Replaces:	Originator:	Page X of Y
February 2020	Guidance for Member Blogs 2013	Chief Executive/Clerk	1 of 10
Board Ratification:		17/02/20	

History or Most Recent Policy Changes – MUST BE COMPLETED		
Version:	Date:	Change:
1	18/11/2013	Original Document
2	10/02/2020	Modernised and Updated

1. INTRODUCTION

This policy is intended to provide clear guidance regarding the acceptable use of electronic communications and social media both within, and outside, of work. The policy covers you if you are:

- A Member of the Board
- One of our employees
- An agency, temporary or contract member of staff working for us or on our behalf
- Staff of third-party suppliers contracted to and/or providing services to the Authority
- Volunteers working with us on our projects
- Students on work placements with us.

In support of the policy, you should consult the Code of Conduct and Media Contact Policy.

There is increasing use of social media for work related purposes, be this posting proactive messages about our services or activities; dealing with queries, complaints or comments; uploading audio and video material or professional/peer networking.

The following guidance is put together for Commissioners and staff who may have chosen to set up and run their own personal social media blogs. There is clear distinction between member information published by Onchan District Commissioners, such as the member pages on the Authority's website, and member blogs which are the sole responsibility of the individual member.

There are important reasons for this distinction. Material published by the Authority is, for obvious reasons, restricted in terms of content. It must not contain party political material and, in relation to other material, should not persuade the public to a view, promote the personal image of a particular Board Member, promote an individual Member's proposals, decisions or recommendations, or personalise issues. Nor should the Authority assist in the publication of any material that does any of the above.

Nonetheless Onchan District Commissioners takes the view that social media can make a positive contribution to improving community engagement and leadership.

The following is a brief guide to some of the legal pitfalls for members in establishing their own social media accounts. Almost all of these can be avoided if the content of the blog is objective, balanced, informative and accurate.

2. UNDERSTANDING THE RISKS OF SOCIAL MEDIA

Exceptional care should be taken when using any social media tools. Most social media sites work on the principle of 'broadcast-by-default', which means it is not always possible to control who may, or may not, see the content.

Even where such sites allow users to set up privacy settings and to block unwanted contacts, the content published may be broadcast beyond a controlled audience.

The terms and conditions of such sites give powers and, in many cases, ownership of the published content to the social media site itself, and not to the originator. Clear legal precedents have now emerged whereby the misuse of social media can result in both civil and criminal action. Users of digital communication channels need to have due regard for such consequences.

3. ACCEPTABLE USE AND MONITORING SOCIAL MEDIA

This policy should be read together with Onchan District Commissioners' other policies, and, as such, the Code of Conduct, Internet and Email Policy and Media Contact Policy, and the duty and obligations they impose, also apply.

Any activity using social media, which could be deemed a breach of the code of conduct or internet and email policy and media contact policy will be subject to investigation in the same way that similar action would be in other circumstances, for example, verbally in the work-place, on the phone or in public.

No data about individuals or organisations collected for the Authority's business use should be published or distributed via social media because:

- We cannot control or secure the potential audience
- We cannot ensure ownership of this data remains with Onchan District Commissioners
- We must comply with relevant laws before sharing data with partners
- We have a duty of care to the data 'subject'.

We reserve the right to monitor and maintain audit trails of electronic communications (including, but not limited to, content on social media sites, or other digital communication channels and/or email sent using the Authority's email system).

We do not monitor use of electronic communications or social media set up by individuals and not in the name of Onchan District Commissioners.

However, where items are published electronically referring to Onchan District Commissioners, our business, activities or services, or to named employees in their Authority's role, we may respond where it is brought to our attention.

4. OFFICIAL COMMUNICATIONS

Our policies and procedures for official communications, and for issuing media statements, apply equally to digital communications and social media.

Only those with delegated authority to issue such statements should use electronic communications and social media to do so.

Before any official public statement or post intended as a news release or in response to an enquiry from the media is issued, it must be checked and approved by the Chief Executive/Clerk in line with the Media Contact Policy.

Official communications prepared in advance, with an embargo set, must not be published using a digital or social media channel before the embargo date and time.

It is also important we continue to have effective internal communications which allow us to share information with staff and others on a basis of trust and in confidence.

No content published or distributed as an internal communication or as a communication with or between trusted partner(s), may be copied or republished via a digital or social media channel without prior authorisation.

5. SOCIAL MEDIA FOR WORK USE

We allow, and encourage, the use of social media and digital channels of communication for business purposes as defined in this policy. Examples may include:

- To engage residents (or other stakeholders) who prefer to use social media
- To engage partner organisations who use social media
- To participate in peer and professional body networks
- To access business-related content posted or published via social media.

We have a duty to protect ourselves and our reputation and want to use social media in a way that is consistent with our overall communications strategy.

If you want to set up a new social media or digital channel(s), you need to clearly justify the need to do this and gain approval from the Chief Executive/Clerk after consultation with your line manager. The Chief Executive/Clerk will provide advice on what is required and how the site(s) should be branded.

The use of such sites will be monitored, and passwords must be shared with the Senior Management Team.

Social media accounts should make it clear in the description that they are provided by Onchan District Commissioners. The Authority's Crest must be used as the profile image for service led accounts unless agreed otherwise with the Chief Executive/Clerk.

You should not use a separate social media site for content that could (and should) be published on the corporate Twitter or Facebook sites or the Onchan District Commissioners' website.

If you wish to extend the reach of relevant content, it should be published on the Authority's website first, before a link to the material is posted to social media.

If you are signing up to any social media facility for work use, you should use your Onchan District Commissioners' email address and give your job title.

Our customers and others have a right to transparency and openness.

Do not forget you represent Onchan District Commissioners when posting to social media or digital platforms.

Any content you publish or post (and any material you access) must be relevant to your role at Onchan District Commissioners and could be understood to be made on behalf of the Authority.

In the same way that you are responsible for your actions by email, on the telephone or when wearing your Authority's ID badge, you are entirely responsible for your actions, views, opinions and any published comments on social media.

6. YOUR PERSONAL USE OF SOCIAL MEDIA

Onchan District Commissioners does not want to prevent or restrict your use of social media in your own time and for your own purposes.

However, we need to make you aware that if your personal use of social media conflicts with your duties for the Authority, or your obligations as an employee, as a contracted supplier, a volunteer or Commissioner, then we may take action.

No private information you have as a representative of Onchan District Commissioners should be copied, published or commented upon when using social media for personal use.

Our standards and codes of behaviour extend beyond the workplace in respect of your actions or communication(s) that could bring the Authority into disrepute.

6.1 Blog Sites

A Blog is usually accepted as a personal website created either by or for a person, with the aim of promoting the aforementioned persons views, opinions or sharing pictures or data files or simply to offer recommendations.

More recently it has become widely accepted that a Blog can also mean a "BLOG POST" as used on social media platforms.

If a Member has a personal "BLOGSITE" then in addition to the guidance notes within this publication they may wish to consider these elements, in terms of their personal information, data protection and "being safe online".

- Choose a Domain appropriate to their blogsite e.g. www.yourpersonalname.com (This makes it clear that they are the official owner of the personal blogsite and that the site expresses their opinions are not that of the Authority.
- They ensure that, they have an active SSL certificate attached to this site for the sites security and also to showcase that, if people are contacting them via this site, that the valid SSL certificate helps ensure that, the message and data sent to the Blogsite owner by the site visitor will be held securely and transmitted to the Blogsite owner safely and is less likely to be intercepted by a hacker or third party.
- The Blogsite is hosted on secure servers with regular checks to protect against Fraud, Hacking, Spamming, etc.

7. USE OF SOCIAL MEDIA AT WORK

We do not block access to social media sites at work but will restrict access to sites whose purpose or content are not consistent with our values and policies.

Personal use of social media sites is only permitted in your own time.

If you are suspected of using social media for personal use during working time, just as carrying out other personal activities in work time, you may be subject to investigation and potential disciplinary action.

Your use of social media and other electronic communications, whether for work or personal use, must be consistent with the standards of behaviour expected by the Authority at all times, and must be legal.

8. SAFETY

Users must be aware of their own safety when placing information on the Internet and not publish information which could give details which could leave them vulnerable.

Anyone receiving threats, abuse or harassment via their use of social media should report it to the Police.

9. INFORMATION PROTECTION

Be careful about the information you disclose, either in your profile, or the information you share through comments and posts. You may be revealing information that you would not want to be in the public domain about where you will be at a particular time or about your family.

10. THE ACCEPTABLE USE OF SOCIAL MEDIA BY CUSTOMERS AND RESIDENTS

We recognise that social media has an important role to play in how we communicate with, engage and promote dialogue with our residents.

For some people, sites like Twitter and Facebook are their preferred method of interacting with the Authority.

We are pleased to be able to offer this method for people to get in touch, to ask us questions, reporting issues and to seek our help or support.

We have an existing process for dealing with complaints via the 'report a problem section on our website.

We acknowledge that everyone has a right to free speech. This is enshrined in law. But, a right to free speech must be balanced with laws covering matters such as libel and defamation, contempt of court, harassment, the Interception of Communications Act 1988, Computer Security Act 1992 and what is generally acceptable.

As an Authority, we also have a duty of care towards our employees and Commissioners.

10.1 WHAT IS AND ISN'T ACCEPTABLE

We know that there will be times when people will be unhappy with what Onchan District Commissioners does (or doesn't do) or the decisions it takes.

Criticism is a fact of life and we know organisations like ours are in the public spotlight. In fact, we encourage public debate and it's good that people are free to share their views about the District and Onchan District Commissioners.

We have no intention of stifling discussion about us as an organisation. But we do draw the line at posts or messages, on whatever channel or social media site, that cross the line in terms of acceptability. This includes targeting named members of staff with direct, unacceptable, criticism.

We will reserve the right to take action in relation to social media posts or messages which:

- Are abusive
- Are harassing
- Are threatening
- Use sexist, racist or other unacceptable language/swear words which are intended to cause concern/harm
- Are defamatory or libellous
- May be in contempt of court
- Break any other law (such as hate crime)
- Are spam
- Contain inappropriate material (photographs or video)
- Incite someone/people to break the law.

10.2 HOW WE WILL DEAL WITH UNACCEPTABLE BEHAVIOUR

In the first instance, the Department Head will issue a written warning to the author in private via a direct message, or email if appropriate and any inappropriate material removed immediately from the Authority's social media feeds.

The Department Head will make all efforts to identify the person responsible, but where they cannot, or, in the case unacceptable content continues to be published, they will remove posts, messages or content considered to be unacceptable, from the

Authority's social media feeds. If unacceptable behaviour continues the Authority will consider blocking users from interacting with the Authority's feed.

A decision to block a user will be made by the Chief Executive/Clerk in consultation with the Chairman of the Authority. If a block is imposed, the Chief Executive/Clerk will write to the person concerned, explaining the reasons and setting out the terms of when the Authority will review the block.

The Chief Executive/Clerk will use their discretion and a decision whether to continue blocking a user will be made on a regular basis.

Unacceptable behaviour may also be addressed by restricting the way someone can communicate with the Authority, or their participation/attendance at meetings.

We may also report the matter to the Police where behaviour amounts to abuse or harassment or a criminal offence is suspected.

All decisions on these matters will be made by the Chief Executive/Clerk in consultation with the Chairman. And, Onchan District Commissioners reserves the right to take whatever legal action that may be necessary in the case of libellous or defamatory posts/messages.

11. DATA PROTECTION ACT

The Data Protection Act applies to the use of digital communications. Therefore, whether using social media for work or personal purposes, you are advised to follow the principles of this act when referring to any other living individual. Failure to do so could lead to enforcement action and potential civil or criminal action against the Authority and/or against you as the individual responsible.

The Authority holds and processes personal data and has responsibilities under the Data Protection Act 2018 ("the Act"). All employees have an obligation to assist the Authority comply with its responsibilities under the Act and you should exercise due care when holding, processing or disclosing any personal data.

Individual Commissioners are required to be personally registered with the Office of the Data Protection Supervisor, and further guidance of responsibilities under the Data Protection Act 2018 can be obtained from this office.