

ONCHAN DISTRICT COMMISSIONERS

SOCIAL MEDIA POLICY

Version 1.0

Adopted:
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Introduction

This policy is intended to cover both staff and political members of Onchan District Commissioners. For staff it is supplemental to their terms and conditions of employment, and for both parties it is supplemental to the Standing Orders of Onchan District Commissioners. For ease, Onchan District Commissioners will be referred to as “the Authority” throughout this document.

It is important that you read each section that affects you or your work since you will, in the future, be deemed to be aware of its contents in the event that there is any breach of the Authority’s policy.

The Authority wishes to encourage the use of electronic media in the conduct of its business. The Authority expects you to use these facilities sensibly and act professionally as you would in the normal course of work. For example, when sending e-mail messages, you should always use the same safeguards and precautions as you would when sending a fax or letter. Similarly, you should exercise proper judgment as to which internet sites you visit.

The Authority accepts that it is sometimes difficult to be sure of the boundaries between what is acceptable and unacceptable behavior, and has set down guidelines for the use of social media (which may be amended from time to time). If you do not understand any of the following rules, please discuss this with your manager or the Chief Executive.

You will be liable to disciplinary action if you are found to have breached these guidelines.

Scope

This policy outlines what is expected of elected members and staff when using social media, in order to protect the reputation and legitimate interests of the Authority.

The aim of the policy is to build an understanding of what is appropriate and productive use of social media, to minimise miscommunication and prevent misuse of social media tools that will undermine Onchan District Commissioners' brand.

This policy relates to all use of social media, whether in or outside of official capacities.

In describing appropriate activity the Policy recognises that elected members and staff may use social media in a private capacity or a work capacity, either during work time or personal time, using Onchan District Commissioners property or personal property.

What is social media and why do we use it?

Social media is the term for online tools, websites and interactive media that enable users to interact with each other by sharing information, opinions, knowledge and interests.

Simply put, social media is a collection of internet based tools which facilitate conversations.

Social media is now strongly embedded in culture as a personal tool for networking and communication, and is increasingly being used as core component of marketing and communications strategies by governments and businesses.

Social media are primarily Internet - and mobile-based tools for sharing and discussing information.

The term most often refers to activities that integrate technology, telecommunications and social interaction, and the construction of words, pictures, videos and audio. Social media can take many different forms, including Internet forums, weblogs, wikis, podcasts, pictures and video. Technologies include: blogs, picture-sharing, wall-postings, email, instant messaging, music-sharing, crowdsourcing, and voice over IP, to name a few.

Examples of social media applications are Google Groups, MySpace, Facebook, YouTube, Flickr, and Twitter.

The desire to connect with governments using social media is increasing along with an expectation that this form of communication will be available.

Social media can support organisations in the following:

- providing information and getting feedback;
- demonstrating the business personality/brand;
- ensuring organisational transparency;
- improving internal communications; and
- market research which is low cost.

Among the advantages of social media are that it:

- is fast/can be immediate;
- is low cost in comparison with traditional forms of communication;
- enhances transparency;
- can build a sense of belonging in a neighbourhood;
- increases resident satisfaction levels;
- allows for easy content creation/development/dissemination;
- can establish large, powerful networks;
- potentially can reach a large audience; and
- can build reputation through attracting attention.

Around the world, organisations are using social media in a myriad of ways including event promotion, communication including local laws, getting community feedback including from hard to reach groups, establishing ongoing networks, emergency management, recruitment, branding and consulting in strategic and specific issues.

Use of social media needs to be embedded within broader governance, communications and marketing strategies, an understanding that there is a need to choose the right tool for the task and awareness of what is appropriate or inappropriate use of social media.

Some detail on the variety of social media platforms is provided in Appendix 1.

Key principles

1. *Social media will be used as a communication tool and to facilitate professional development and online collaboration. Social media will not be the driver for building a communications strategy, but rather, a tactic applied.*
2. *Information disseminated through social media will be accurate, authorised and aligned with Onchan District Commissioners strategies, policies and decisions.*
3. *Use of social media will always follow clear identification of objectives and the right tools to meet those objectives.*
4. *Private information will be protected and copyright, privacy and other applicable laws will be taken into account when interacting with social media.*
5. *There will continue to be appropriate record keeping of official information disseminated or collected via social media.*
6. *The use of social media is a personal responsibility regardless of whether it is authorised or individual, in or out of work.*
7. *In developing, posting and responding to content, staff and elected members will uphold the values of Onchan District Commissioners by acting with honesty, integrity, courtesy and professionalism and will not be discriminatory, defamatory, harassing or encourage law breaking.*
8. *All elected members and employees are responsible for being familiar with this policy.*

Acceptable Use

1. **General**

The Authority's main purpose in providing IT facilities for email and the internet is to support the approved business activities of Onchan District Commissioners. IT facilities provided by the Authority for internet and email should not be abused. An absolute definition of abuse is difficult to achieve but certainly includes (but is not necessarily limited to):

- Creation or transmission of material which brings Onchan District Commissioners into disrepute.
- Creation or transmission of material that is illegal.
- The transmission of unsolicited commercial or advertising material, chain letters, press releases or other junk-mail of any kind
- The unauthorised transmission to a third party of confidential material concerning the activities of Onchan District Commissioners.
- The transmission of material such that this infringes the copyright of another person, including intellectual property rights.
- Activities that unreasonably waste staff effort or networked resources, or activities that unreasonably serve to deny service to other users.
- Activities that corrupt or destroy other users' data or disrupt the work of other users.
- Unreasonable or excessive personal use. (See 2 below).
- Creation or transmission of any offensive, obscene or indecent images, data or other material. (Other than for reasons specified in 3 below).
- Creation or transmission of material which is designed or likely to cause annoyance, inconvenience or anxiety.
- Creation or transmission of material that is abusive or threatening to others, serves to harass or bully others, discriminates or encourages discrimination on racial or ethnic grounds, or on grounds of gender, sexual orientation, marital status, and disability, political or religious beliefs.
- Creation or transmission of defamatory material or material that includes claims of a deceptive nature.
- Activities that violate the privacy of others or unfairly criticise, misrepresent others; this includes copying distribution to other individuals.
- Creation or transmission of anonymous messages or deliberately forging messages or email header information, (i.e. without clear identification of the sender) or for 'flaming'.
- The unauthorised provision of access to Onchan District Commissioners' services and facilities by third parties.

2. **Personal Use**

We appreciate that you may occasionally want to use the system and/or the facilities for your own purposes and we expect you to use it responsibly. If at all possible, make it clear that you are representing yourself in a personal capacity. For example, indicate that the e-mail is personal/not work related. Always follow the rules and guidance set out in the internet and e-mail policies and, particularly, ensure that your personal use of the system:

- ◆ does not take priority over your work responsibilities;
- ◆ does not incur any unwarranted expenses on the Authority; and

- ◆ does not have a negative impact on the Authority in any way.

An absolute definition of abuse is difficult to achieve but certainly includes (but is not necessarily limited to):

- A level of use that is not detrimental to the main purpose for which the facilities are provided. *Priority must be given to use of resources for the main purpose for which they are provided.*
- Not being of a commercial or profit-making nature, or for any other form of personal financial gain.
- Not be of a nature that competes with Onchan District Commissioners in business.
- Not be connected with any use or application that conflicts with an employee's obligations to Onchan District Commissioners as their employer.
- Not be against Onchan District Commissioners' rules, regulations, policies and procedures and in particular this email policy.

3. Research and Related

It is recognised that, in the course of their work or research, individuals of the Authority may have a requirement to transmit or receive material that would normally be defined as offensive, obscene, indecent or similar. In the case of properly supervised or lawful research purposes it is acceptable to do so. If in doubt advice should be sought.

Links to other Onchan District Commissioners policies

Using social media is not without risks and challenges and this policy aims to address some areas of concern such as inappropriate use, record keeping and resourcing. Some other issues are best covered in other policies and those related policies are outlined here:

- Internet and Email Policy
- Guidance for Member Blogs
- Emergency Management Plan

These policies have been reviewed to ensure alignment with this Social Media Policy.

Corporate use of social media

Authorised officers

Elected members and staff intending to use social media to communicate about Onchan District Commissioners activity or policy should ensure appropriate authorisation as per the Responsibilities/Delegations table below.

All elected members and staff should register their social media account/tools/site being used for corporate activity with the Chief Executive.

Responsibilities/delegations

The Roles and Responsibilities Table should be used to establish who will write and post content, who will approve/moderate incoming content, and who will respond to negative and positive posts (and how). It should also detail the type of content which must be approved – eg commitment to events, activities, actions, information on Contentious issues. Announcements of new services, events etc.

Chairman	<ul style="list-style-type: none"> Should seek advice from the Chief Executive and/or Deputy Chief Executive regarding tools available and should be communicating in their role as outlined in Local Government Act 1985 (i.e. act as spokesperson of Onchan District Commissioners).
Chief Executive	<ul style="list-style-type: none"> Should ensure responsibilities/delegations in relation to Social Media are clearly defined and act as a source of advice to the Chairman. Should approve use of Onchan District Commissioners branding. Should ensure compliance with social media provider conditions. Should act as the spokesperson on operational issues or issues of fact.
Elected Members	<ul style="list-style-type: none"> Should seek advice from the Chief Executive and be sure not to speak on behalf of the Onchan District Commissioners as this is the Chairman's role (see above). A person authorised to comment on behalf of Onchan District Commissioners may be limited by the Board to particular topic or specific types of social media or both. Comment only on topics within your area of expertise and authority. Comply with terms of use.
All Staff	<ul style="list-style-type: none"> Should have approval for use from relevant manager. Must maintain records and not delete any posts without approval of the Chief Executive. Must comply with conditions of use. A person authorised to comment on behalf of Onchan District Commissioners may be limited to particular topic or specific types of social media or both. Comment only on topics within your area of expertise and authority and unless otherwise authorised comment only on matters which are operational or routine in their own area of responsibility.
Managers	<p>Training in responsible use of social media. Training for moderators.</p>
Finance Manager	<p>Training in responsible use of social media and training for moderators. Strategy/Action Plan/Register Disclaimers Develop record keeping procedures Monitoring</p>

	Legal advice
ICT/IT Managers/Department	Secure access/backup.
Moderator (Chief Executive)	Should be a person with knowledge of Onchan District Commissioners' policies or guidelines and with experience in managing sites/software etc.

Appendix 2 provides an Onchan District Commissioners Self-Assessment flow chart designed by the which may assist Onchan District Commissioners in their social media related decision-making.

Content

Onchan District Commissioners has a clearly established and disseminated plan as to who will write and post content, who will approve/moderate incoming content, and who will respond to negative and positive posts (and how). Corporate content will only be posted by authorised officers (who can be staff or elected members) as outlined earlier.

When communicating on behalf of Onchan District Commissioners, elected members and staff must identify their relationship with Onchan District Commissioners by their stating name and position. Generally, no-one should provide email or phone number contacts.

Uploaded content will only refer to information which is classified as suitable for the public domain.

Content Managers will ensure the information posted is accurate and not misleading in any way.

In developing, posting and responding to content, authorised officers WILL:

- uphold the values of the Onchan District Commissioners by acting with honesty, integrity, courtesy and professionalism;
- ensure that all relevant legislation has been complied with and that there is adherence to Onchan District Commissioners codes, policies and procedures;
- avoid political bias;
- act in a timely manner; and
- take steps to avoid real or potential conflicts of interest.

When developing or posting content, authorised officers must NOT:

- use abusive, profane or sexually explicit language;
- undertake commercial solicitations or transactions;
- use copyright or ownership protected materials without appropriate approvals;
- be discriminatory, defamatory, or encourage law breaking;
- compromise Onchan District Commissioners, employee or system safety;
- spam; or
- air personal campaigns.

Content removal

Onchan District Commissioners reserves the right to remove certain content such as illegal or offensive material. Material that is reasonably critical of Onchan District Commissioners will not be deleted.

Onchan District Commissioners will always state why a post or content was removed regardless of who posted.

Monitoring/moderating/responding

As a minimum requirement, Onchan District Commissioners will monitor social media content and exchanges at least [twice daily, Monday to Friday] and establish whether:

- comments need replies or removal.
- current content is factual, accurate and up-to-date.
- posts are relevant.
- new information needs uploading.

Onchan District Commissioners will make use of digital monitoring tools whenever available as part of their evaluation of social media activities.

The Chief Executive will specify the kind of comments of feedback that the authorised officer will and will not respond to e.g. constructive feedback will receive a response while remarks of a derogatory nature will not.

Access

- 1) Staff members who are authorised to post comments on behalf of Onchan District Commissioners must do so from the administrative profiles set up for Onchan District Commissioners.
- 2) Those accounts are:
 - Onchan District Commissioners Facebook
 - Onchan.org.im
 - Flickr
 - Web Forums
 - Blogs

Branding

The brand is the corporate identity of Onchan District Commissioners and can take many forms (name, sign, symbol, colour combination, slogan). A clear brand is an essential tool in online communications.

The Onchan District Commissioners logo should always be attached to corporate content.

Authorised officers will adhere to Onchan District Commissioners corporate style guide when developing and uploading content.

Engagement

Social Media tools may be used for community engagement as appropriate. Consideration will first be given to what the desired outcome is, the resources available and relevance of social media tools.

Use of Social Media for engagement will be supported by a project plan or business case which clearly articulate how the process will be managed.

Copyright

Material which is copyrighted (applications, audio, video, graphics, images, photographs, publications) will not be used unless prior written consent is obtained from the creator or copyright owner and the original author or source of the material is acknowledged.

Authorised officers will be diligent in their consideration of brand, copyright, fair use and trademarks.

Website

Information provided through social media will be replicated on the Onchan District Commissioners' website.

Risks

A risk analysis with related mitigation strategies will be undertaken for each new planned aspect of social media use. Such analysis will consider things like lack of followers, blurring of professional and personal communications, online activism and negative comments, expectation of instant responses, breaches of law or codes of conduct, unauthorised posts.

The following risks have been identified with the use of social media:-

- Virus or other malware (malicious software) infection from infected sites
- Disclosure of confidential information
- Damage to the reputation of the Authority
- Social engineering attacks or 'phishing'. This is the act of manipulating people into disclosing confidential material or carrying out certain actions. Social engineering is often conducted by individuals fraudulently claiming to be a business or client.
- Bullying or witch-hunting
- Civil or criminal action relating to breaches of legislation
- Breach of safeguarding through use of images or personal details leading to the exploitation of vulnerable individuals.

The liabilities section of this policy covers some specific risks but legal advice should be sought where appropriate.

In considering how to proceed, Onchan District Commissioners will give detailed consideration to:

- The protection of privacy and the confidentiality of Onchan District Commissioners and ratepayer information.
- Preventing disclosure of corporate information outside that which is authorised or publically available.
- How Onchan District Commissioners' intellectual property and copyright will be protected.
- The terms of service for nominated social media sites.

- How Onchan District Commissioners will respond to orchestrated campaigns by skilled social media users.
- The level of response for issues raised by people outside the municipality.
- What constitutes a representation as defined under the *Local Government Act* (for example a tweet is not a representation).

Record management

In using social media, Onchan District Commissioners will comply with the requirements of the Public Records Act 1999 and any other relevant legislation.

Consideration of recording keeping requirements will be made as part of each new planned use of social media.

The five key questions to help identify whether a record should be kept are:

1. Was it made, sent or received in the course of business?
2. Does it document a decision taken?
3. Does it document advice given?
4. Does it document the process of arriving at a decision?
5. Is it required to be kept by legislation?

Resourcing/training

Onchan District Commissioners will ensure that social media activities are adequately resourced to allow for content development, monitoring, interpreting the volume and content of messages and responding as required.

Evaluation

Onchan District Commissioners' social media activity will be evaluated and related to the desired outcomes.

Misuse of corporate social media

Prohibited or offensive activities

Staff and elected members must not post or respond to material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist or infringes copyright.

Staff and elected members must not establish fictitious names or identities deliberately intended to deceive, mislead or lie.

Staff and elected members must not bring Onchan District Commissioners' integrity into disrepute, or harm the operations or reputation of Onchan District Commissioners.

Staff and elected members must separate personal opinions from professional ones.

Staff and elected members must avoid the use of business email addresses for personal social media logins.

Personal use of social media

Onchan District Commissioners will not require staff or elected members to provide access to a personal social media account. However, personal use must comply with this policy.

In work time

Onchan District Commissioners supports the use of social media for professional purposes such as communicating with fellow employees or colleagues, acquiring or sharing information, and use for educational or professional development activities.

Incidental use of social media during work time is permissible provided use of equipment and consumption of space on network is kept to a minimum and does not compromise, pre-empt or impact adversely upon Onchan District Commissioners business. Such use should not interfere with productivity, effectiveness and legitimate work activities and the time spent on personal use must be kept to minimum. Excessive use will incur sanctions under the capability procedures.

Onchan District Commissioners will provide notice if monitoring of social media usage is to be introduced.

Making comments about Onchan District Commissioners

In using social media for personal communication, staff and elected members must not purport to represent the Onchan District Commissioners. It is permissible to mention where you work provided the website is appropriate for people of all ages – e.g. not a gambling or adult website, but you must make it clear you don't speak on behalf of Onchan District Commissioners.

Staff and elected members can post public information about Onchan District Commissioners – that is information which can be found on Onchan District Commissioners' website. They may also join and participate in official Onchan District Commissioners social media sites.

In using social media for personal communications, staff must not:

- damage the reputation of Onchan District Commissioners,
- use Onchan District Commissioners' intellectual property or copyrighted materials,
- disclose sensitive or confidential information, or
- post offensive or defamatory comments – particularly about the Onchan District Commissioners, Onchan District Commissioners staff or elected members.

Consideration should be given to the following:

1. Could what you are doing harm the reputation of Onchan District Commissioners?
2. Are you disclosing Onchan District Commissioners material that you are not authorised to disclose?
3. Have you made it clear to others when your contribution is as a private individual, not an employee or Member of Onchan District Commissioners?
4. Are you willing to defend your post to your Manager or the Board?
5. Would you be comfortable saying it to a stranger at a bus stop or posting in on a public shop window?
6. Are you behaving with integrity, respect and accountability?

Breach of policy penalties.

Staff and elected members must comply fully with the policy at all times.

If you are not sure if an activity complies, speak to the Chief Executive. Non compliance is serious matter and appropriate action will be taken.

Nothing in this policy should be interpreted as diminishing or attempting to diminish an employee's right to engage in lawful industrial activities.

An Elected Member breaching this policy may be subject under Standing Orders or other relevant legislation.

Staff breaching this policy may be subject to disciplinary action in accordance with their terms of employment.

Legal issues/liabilities

Defamation/offensive/obscene

Social media can appear to blur private and public spheres but activities on social media websites should be considered public activities. Despite the availability of privacy functions on social media websites, the possibility exists for content to be shared beyond intended recipients. Additionally it should be noted that the terms and conditions of use for most social media sites state that all content becomes the property of the site on which it is posted.

Online content is essentially permanent and should NEVER be considered private.

Staff and elected members must not post offensive, obscene or defamatory content.

Privacy/confidentiality

In using social media, staff and elected members will be cognisant that personal and sensitive information cannot be published without permission of the person to which that information belongs.

Staff and elected members must not disclose confidential Onchan District Commissioners information, including but not limited to matters relating to closed meetings of Onchan District Commissioners.

Security risks

Staff and elected members must be cognisant of security risks to Onchan District Commissioners through the use of social media and will comply with published policies in relation to use of the Authority's equipment.

Staff and elected members will also give consideration to security risks in relation to content development and uploading, recognising that while one small fact alone might not form a security risk collectively all

posted information can form part of a jigsaw puzzle that can be used against the interests of Onchan District Commissioners.

Dispute resolution

Disputes will be referred to the Chief Executive in the first instance.

Adoption of the Social Media Policy

This policy was adopted by the Onchan District Commissioners on (insert date) and is due for review by Onchan District Commissioners by (insert date).

Date of Approval	
Source of Approval	Onchan District Commissioners Resolution No.:
Date of Commencement	
Source of Authority	Local Government Act 1985
Strategic Plan Reference	
Date of Review	
Previous Policies Withdrawn or Amended	This policy supersedes all other social media policies and Onchan District Commissioners resolutions in relation to social media.
Department Responsible for Implementation	
Department Responsible for Policy	
Publication of Policy	Members of the public may inspect this policy at the offices of Onchan District Commissioners, Hawthorn Villa, 79 Main Road, Onchan. Copies can be obtained free of charge. Alternatively, it can be accessed on Onchan District Commissioners' website www.onchan.org.im

Appendices

1. Social media platforms

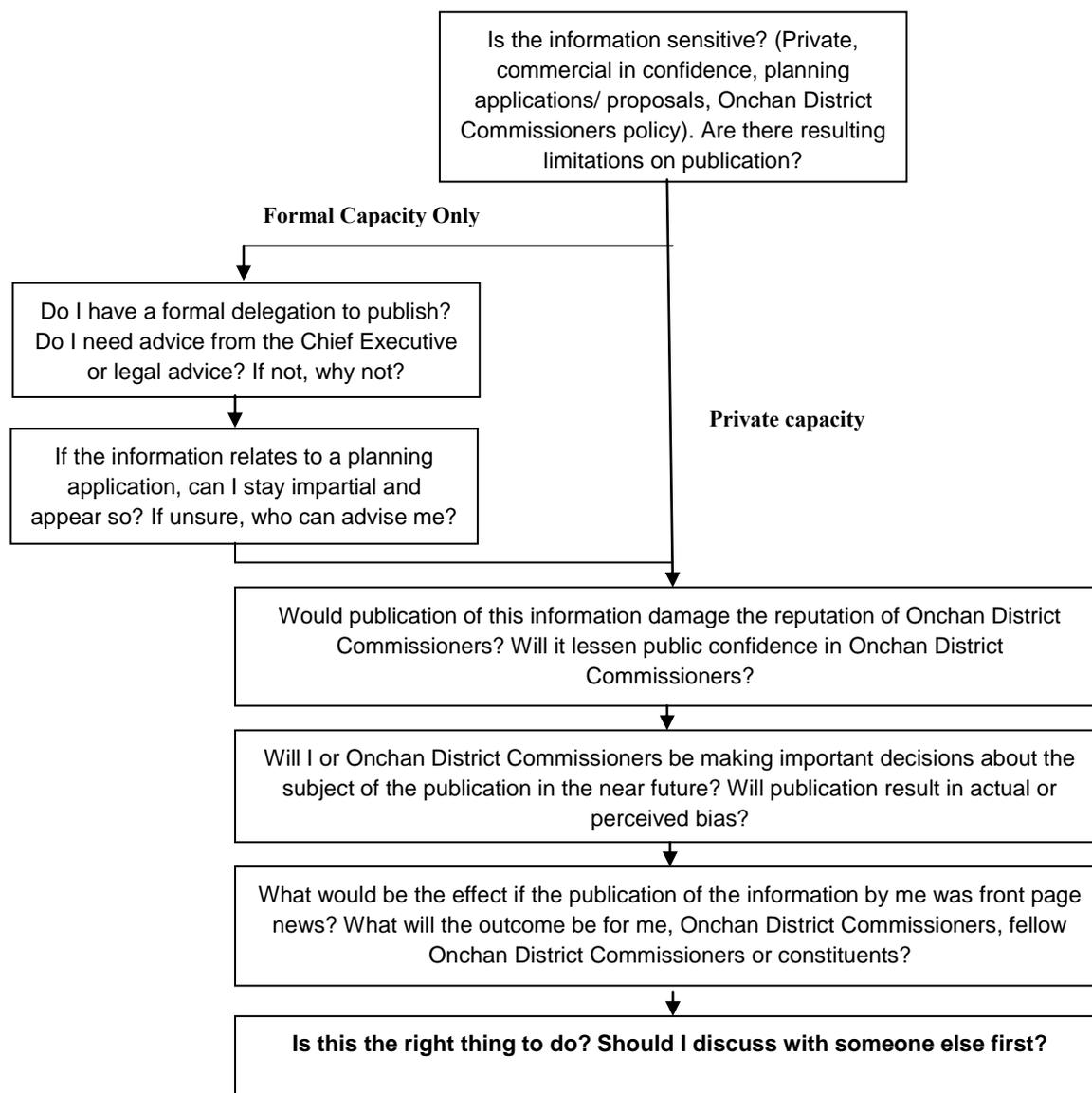
Social media platforms vary in their level of engagement from 1:1 (eg Email, Personal Messages, Chat) to 1:Many (Blogs, photo sharing), Many:Many (Forums) and Few:Few (gated – follow me services).

Wiki	Collaborative websites where users can create web pages and have others add, remove and maintain information on a topic or thread.
Social Networking Users can upload content that is used to connect, communicate and share with others, building online communities with shared interests.	Facebook Popular free site that allows registered users to create profiles, upload photos and video, send messages and keep in touch with friends, family and colleagues. ¹
	Twitter Social networking and micro blogging site enabling users to send and read short messages called Tweets.
	LinkedIn This site is geared towards companies and industry professionals looking to make new business contacts or keep in touch with previous co-workers, affiliates and clients. ²
Internet Forums	A forum or message board is an online discussion site.
Blogs	Online journals of opinion captured in brief paragraphs that a constantly updated.
Photo sharing sites Allows users to upload images and is useful for categorising and organising pictures. Allows other users to comment on them or re-use with permission.	Pinterest A virtual pinboard which allows organisation and sharing of internet based information and photos.
	Flickr Online photo management and sharing application.
	Instagram A photo sharing and social network program with distinctive visual features.
Video sharing Sites	YouTube A video sharing website which allows users to upload, share and view videos.
Podcasting	Sites supporting the posting of audio files that can be downloaded and used by others.

¹ <http://whatis.techtarget.com/definition/Facebook>

² <http://www.hudsonhorizons.com/Our-Company/Internet-Glossary/LinkedIn.htm>

2. Questions for consideration by elected members.



Howard A.E (2012), *Connecting with Communities: How Local Government is Using Social Media to Engage with Citizens*, ANZOG Institute for Governance at the University of Canberra and Australian Centre for Excellence in Local Government,