



## **Flitwick Town Council** **Social Media Policy**

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## 1. Policy Statement

Flitwick Town Council (hereafter FTC), encourages participation and engagement in social media, subject to employees and members following appropriate use and common-sense guidelines when referencing FTC.

## 2. Purpose

The purpose of this policy is to direct all users of Council social media accounts by:

- Providing guidance on expected working practice.
- Highlighting issues and risks which may arise while using social media.
- Informing users about the acceptable use of social media sites.
- Outlining the standards which users must maintain.
- Providing standard responses to common queries and enquiries by members of the public.
- Providing guidance on interacting with followers and monitoring comments from external users.
- Warning users about the consequences of inappropriate use of Council social media accounts.
- Warning users about the consequences of inappropriate use of personal social media accounts.

## 3. Scope

This policy applies to Flitwick Town Council Members, Committees, Services, Partners, Employees of the Council, contractual third parties and agents of the Council who have been designated as authorised users of social media accounts.

This policy covers all use of social media including Council social media accounts and personal social media accounts and properties.

Breach of this policy by any employee of Flitwick Town Council may be regarded as a disciplinary offence. Members should be cognisant of the Code of Conduct.

## 4. Definitions

**Social Media** means using websites or applications that enable users to create and share digital content or to participate in social networking.

**Council Social Media Account** means any account or property that is branded in a way that is likely to lead a reader to believe the account is operated by the Council.

**Council Social Media Property** means any social media destination that is in the name of the Council and managed by the Council. Such properties may include Facebook Pages, websites or forums.

**Personal Device** means any electronic device that is not owned by FTC and which is able to access social media including laptops, tablets and mobile devices.

## 5. Risks

Flitwick Town Council recognises that there are risks associated with the use of social media.

This policy recognises and aims to mitigate the following risks:

- Criticism regarding the use of public funds, time and resources.
- Sharing and security of passwords.
- Damage to the reputation of Flitwick Town Council.
- Sharing and misuse of confidential information relating to Members of the Council, employees of the Council or members of the public.

- Inappropriate use of social media including: the posting or sharing of personal views; the posting or sharing of offensive, obscene, discriminatory, defamatory or misleading information.
- Inappropriate comments by or inappropriate interactions with members of the public.
- Endorsing inappropriate or controversial views and content published by other social media users.
- Libel and misleading information; the risk of being sued.
- Illegal use of images without permission from original source; including use of images of minors without the permission of a parent or guardian.
- Inappropriate communication with minors or facilitating such inappropriate communication by other members of the public which may be deemed as 'grooming' or 'cyber-bullying'.
- Deleting public records.
- Theft of intellectual property rights.
- Failing to act upon information given by a member of the public via social media.
- Violating free speech by removing comments without good reason.

Non-compliance with this policy could have a significant effect on the efficient operation of the Council and may result in financial loss and an inability to provide necessary services to our customers.

## **6. Council Social Media Accounts and Properties**

Section 6 describes the policy that applies when posts are made using a Council Social Media Account and where the post is attributable to FTC.

Posts to a Council Social Media Property that are attributed to an individual rather than the Council, and that could have been published by a member of the public are covered by section 7 or 8 rather than section 6.

### **6.1 Purpose and Benefits of Social Media**

Social media provides a platform for Flitwick Town Council to communicate effectively with members of the public. This can be achieved as a two-way process with the Council seeking to keep residents informed in addition to providing a channel through which the public can report issues and direct questions to the Council.

### **6.2 Access to Council Social Media Accounts and Properties**

Employees of Flitwick Town Council may be placed on the Social Media Administration Team (SMAT) and granted access to the Council's social media accounts by the Clerk or Deputy Clerk to configure accounts or post content. This team will normally consist of:

- The Town Clerk
- The Deputy Town Clerk
- Communications Officer
- Community Services Officer
- Weddings and Events Coordinator
- A small number of additional staff who have been trained on the appropriate use of social media and who are expected to promote the work and activities of Flitwick Town Council as part of their employment.

The Clerk shall determine the membership of SMAT. Members of SMAT team must not share login credentials or grant further access without the agreement of the Clerk. The Deputy Clerk may authorise urgent changes to the membership of SMAT if the Clerk is unavailable. The Clerk is required to review all changes at the earliest opportunity.

A register of all social media accounts that are in FTC's name (Council Social Media Accounts) shall be maintained by the Town Clerk. No accounts should be created in FTC's name without the agreement of the Clerk. Every account held in the name the Council shall be accessible to all members of SMAT.

Where an individual with access to a Council account should no longer have access (e.g. where a staff member leaves), the Clerk shall ensure that the user's access is revoked prior to the member of staff leaving. Where necessary any shared passwords must be changed in advance of the staff member leaving.

The Town Clerk shall take all reasonable measures to ensure the outgoing member of staff is no longer able to access any FTC social media account.

In the event that an account is not controlled by the Clerk, including a fake or satirical account, the Clerk will make reasonable efforts to have such accounts suspended or deleted.

### **6.3 Posting with Council Social Media Accounts**

No content may be posted using Council Social Media Accounts without the express authority of the Town Clerk, Deputy Town Clerk or the Town Clerk's nominated administrators - i.e. the Social Media Administration Team (SMAT).

However, the drafting of messages to appear on Council Social Media Accounts from Cllrs, staff members and the general public which show FTC in a positive or newsworthy light is actively encouraged and should be forwarded to SMAT. A well drafted post, with picture/s attached to the email, when appropriate, will enable SMAT to get the message onto the target social media quickly and efficiently.

The general rules when drafting content or posting to social media are:

- Use common sense, follow proper professional etiquette, and be aware that in the digital age, nothing posted is entirely private.
- When you draft a message about FTC to appear on a Council Social Media Account, stick to what you know.
- Do not include in a draft any confidential, undisclosed, proprietary, or internal-use-only information that you obtain as part of your duties with FTC.
- Provide accurate and relevant content that is suitable for the intended audience.

Relevant information from other sources such as other local government authorities and community groups can be included in your draft.

When drafting a post to a social media account the following should be taken into account:

- Do not include any content that is likely to bring FTC, its contractors, staff or members into disrepute.
- Do not include in the draft any inappropriate or misleading information.

### **6.4 Monitoring Social Media and Interacting with Followers**

All members and FTC staff are encouraged to report to SMAT any postings on any social media site that may reflect on FTC in a positive or negative or newsworthy way.

This may include posts from other Councils or organisations which will be of interest to residents of Flitwick, reports of damage to town property and complaints or enquiries from members of the public.

Any interaction and responses to comments made or questions asked on FTC social media sites must be approved by SMAT.

SMAT will be aware of how to respond to comments and questions raised by members of the public. There should be a standard response to common or general enquiries, such as who is responsible for a certain service or how a resident would go about obtaining something.

It is FTC policy to only respond on social media where this will not be controversial or lead to any breach or release of personal or sensitive information. Where FTC does not respond on social

media, SMAT will advise the person concerned to contact the Council via telephone, email or in person.

SMAT will aim to provide a helpful response at all times without becoming embroiled in any conflict or controversy. Once a question has been answered, there is no need to continue with the interaction unless another query is raised.

### **6.5 Inappropriate Content**

SMAT will not consider any draft posts to any Council Social Media Account which may negatively impact the Council, its staff, contractors or members. This non-exhaustive list includes any of the following:

- Content which could be considered libellous or defamatory.
- Content, which is false, misleading or intended to deceive followers.
- Obscene, sexual or violent content.
- Offensive or discriminatory content.
- Content which promotes illegal activity.
- Bullying.
- Inappropriate contact with minors.
- Engaging in controversial or political debate.

Flitwick Town Council should not be seen to endorse any inappropriate, offensive or controversial views posted by other social media users. For this reason, there will be no sharing or commenting on such posts by members of the public. If a member of the public has posted anything which is grossly offensive or illegal on a Council social media property, this will be removed as soon as possible to limit damage to the reputation of the Council and to limit any offense that may be caused.

When members of the public post inappropriate content to a Council page, the individual account may be blocked. Flitwick Town Council may also refer this content to the police or relevant authorities if there is any suspicion of criminal activity, including grooming, hate crime or bullying.

### **6.6 Confidentiality**

All staff are under a general requirement to maintain the confidentiality of information. There are also particular responsibilities under Data Protection legislation to maintain the confidentiality of personal data. If any member of staff is unsure of whether they should pass on information, they should consult the Town Clerk.

Anyone drafting a post should make every effort to ensure that the confidentiality of information is maintained. Everyone must be aware that content which is published through social media cannot be permanently removed from the public domain even when deleted. It is also the case that all content on the official Flitwick Town Council social media accounts automatically become a matter of public record and can be referred to at any time.

Any private, confidential or sensitive information should not be included in any content to be published using the Council's social media accounts or properties including instant messaging functions provided by social media sites, as these messages are not secure and can be easily shared.

### **6.7 Use of Personal Devices**

It is preferred that members of SMAT use Council maintained devices to post with Council social media accounts whenever practicable. Users with access to Council social media accounts or properties should not post content using their personal devices unless specific permission is given by the Clerk or the Deputy Clerk.

Where a personal device is used to post using Council social media properties, the owner of the device commits that:

- They will not allow anyone else to use the device
- The device is protected by a password or PIN that is at least 6 characters in length
- In the event of the redundancy or dismissal, they will remove themselves as an admin from all FTC social media accounts prior to leaving the FTC offices

## **7. Use of Personal Accounts and Properties**

When using personal social media accounts, employees of the Council, as well as third parties, are advised that they should not post or share any information which reflects negatively upon Flitwick Town Council. This includes criticism of Council policies, decisions and procedures.

Personal social media accounts should also not make any reference to any personal details or actions of any member or employee of the Council, any associates of the Council or any member of the public.

When using personal social media accounts, users are advised to follow the message drafting guidelines set out in Section 6. Regarding confidential, sensitive and inappropriate content which has been obtained through their association with Flitwick Town Council.

Use of personal social media accounts by staff during work time should be minimized and must never impact the performance of staff member's duties.

Staff must take care to avoid giving readers the impression that they are representing FTC when publishing any content using their personal accounts. Refer to Appendix D for appropriate disclaimers.

## **8. Members use of Social Media**

Members are encouraged to use all forms of media to build relationships with the community, to promote council activities or to assist with understanding the views of the community in order that they may represent the community's views at council meetings.

Members must comply with the Council's Code of Conduct at all times. No individual member may represent the Council. Members must take care to avoid giving readers the impression that they are representing FTC when publishing any content.

Members may use their individual and, if applicable, any party social media accounts or properties, provided that it is clear that opinions expressed in these channels do not represent the views of the council. Refer to Appendix D for appropriate disclaimers.

## **9. Policy Compliance**

If any user is found to have breached this policy, they may be subject to Flitwick Town Council's disciplinary procedures. If a criminal offence is considered to have been committed further action may be taken to assist in the prosecution of the offender(s).

Access to any Council Social Media Account by a member of SMAT may be withdrawn by the Town Clerk if the user is found to have misused this account.

## **10. Policy Governance**

The following table identifies who within Flitwick Town Council is Accountable, Responsible, Informed or Consulted with regards to this policy. The following definitions apply:

- Responsible – the person(s) responsible for developing and implementing the policy.
- Accountable – the person who has ultimate accountability and authority for the policy.
- Consulted – the person(s) or groups to be consulted prior to final policy implementation or amendment.
- Informed – the person(s) or groups to be informed after policy implementation or amendment.

**Responsible:** Town Council and Committees.

**Accountable:** Town Clerk.

**Consulted:** Town Councillors and Committee Members.

**Informed:** All Council Employees, All Temporary Staff, All Contractors, All Members

#### **11. Review and Revision**

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 4 years.

## Appendix A – Mitigating Risks

Risk	Mitigating this Risk
Criticism regarding the use of public funds, time and resources.	The Social Media Administration Team (SMAT) must ensure that all information posted is relevant to the work of Flitwick Town Council or to the residents of the Town. SMAT should treat the all Council Social Media Accounts as a means to communicating with the public as customers and not for socialising.
Sharing and security of passwords.	SMAT users must not share the login details for Council social media accounts with any unauthorised individual. Other than in exceptional circumstances unless specifically approved by the Town Clerk SMAT users must also refrain from using personal devices and saving login details on these devices.
Damage to the reputation of Flitwick Town Council.	SMAT must ensure that all information posted is relevant and non-controversial. No offensive or inappropriate content should be posted or shared, and any such content should be removed as soon as it has been seen. SMAT users should seek assistance from the Town Clerk whenever action is required to limit damage already done to the reputation of the Town Council.
Sharing and misuse of confidential information relating to Members of the Council, employees of the Council or members of the public.	All staff are under a general requirement to maintain the confidentiality of information. All staff must make every effort to ensure that the confidentiality of information is maintained appropriately when drafting messages for Council Social Media Accounts and should be aware that content which is published through social media cannot be permanently removed from the public domain even when deleted. Any private, confidential or sensitive information should not be posted or shared via the Council's social media accounts. This type of information should also not be shared through the instant messaging functions provided by social media sites, as these messages are not secure and can be easily shared.
Inappropriate use of social media including: the posting or sharing of personal views; the posting or sharing of offensive, obscene, discriminatory, defamatory or misleading information.	SMAT should not post any content which is obscene, defamatory, misleading, discriminatory or offensive. They should also guard against the posting of any personal views of their own, of Councillors, or sharing those of other social media users. Sharing or liking the views and comments of other users would suggest an endorsement for these views from the Council and this should therefore be avoided at all times.
Inappropriate comments by or inappropriate interactions with members of the public.	Flitwick Town Council should not be seen to endorse any inappropriate, offensive or controversial views posted by other social media users. For this reason, SMAT should guard against sharing or commenting on such posts by members of the public. If a member of the public has posted anything which is deemed inappropriate to a Council page, this should be removed as soon as possible to limit damage to the reputation of the Council. If a member of the public repeatedly posts content which is deemed inappropriate to the Council page, then this member of the public should be blocked and reported as a result.
Libel and misleading information; the risk of being sued.	Any posts which could be considered defamatory or libellous regarding an individual or organisation could cause serious damage to the Council. This could include a risk of the Council being sued. As a result, posts should never be made which cast doubt upon the reputation of an individual or organisation. If there is a need to do this the Council must have evidence to support such posts. If a SMAT user is unsure of whether any content might be deemed defamatory or libellous they should consult with the Town Clerk before posting it.



<p>Illegal use of images without permission from original source; as well as use of images of minors without the permission of a parent or guardian.</p>	<p>Images obtained from any other source, online or otherwise, must only be used with the express permission of the copyright owner. Sharing of images from other social media users is acceptable as these will be clearly attributed to the original publisher. Images of individuals should not be used without permission, especially in the case of under-18s where permission must be given by a parent or legal guardian; permission from secondary guardians such as schoolteachers is not sufficient.</p>
<p>Deleting public records.</p>	<p>SMAT users should not delete posts or comments which contain information of public record unless absolutely necessary; if so an original record should be obtained either as a hard copy or on Flitwick Town Council's website.</p>
<p>Theft of Intellectual Property rights or Copyright.</p>	<p>Intellectual Property includes any ideas which are owned by an individual. SMAT users should be wary of the developments in legislation affecting Intellectual Property and should make every effort to credit any idea, Copyright or Trademark which has been borrowed from another individual or organisation.</p>
<p>Failing to act upon information given by a member of the public via social media.</p>	<p>Once a post has been made on the Council's social media account, such as a report from a member of the public, this should be considered as notice served to the Council. The Council has the same obligation therefore to monitor its social media channels for such notices as it does with email accounts, letters from the public and telephone messages. The Council may well be responsible for any consequences caused by its failure to act upon this notice.</p>
<p>Violating free speech by removing comments without good reason.</p>	<p>Flitwick Town Council must reserve the right to delete any comments or posts to its social media accounts by members of the public, if these posts have violated this social media policy. Posts should be deleted only if they are deemed inappropriate for the reasons outlined in Section 6.5. Posts or comments from members of the public should not however be removed for expressing an opinion, however unpopular or critical this is of the Council. Warnings may be given to users once inappropriate comments have been removed to suggest that further violation may result in their account or profile being blocked and/or reported by the Council.</p>

**Appendix B – Mitigating Damage to the Reputation of the Council**

The following steps should be taken to mitigate and limit any damage which has been done to the Council's reputation:

- Monitor social media regularly to ensure that the Council is the first to know of any content which is damaging to its reputation.
- Acknowledge any problems in a clear and transparent way, making clear that the issue has been or will be resolved.
- Respond to comments by members of the public to acknowledge such issues publicly.
- Do not delete any negative comments unless they are deemed inappropriate or offensive, as this will only annoy and dissatisfy members of the public more.
- Ensure that it is easy for members of the public to contact the Council regarding issues, providing an approachable and transparent response.
- If issues are of a sensitive nature, always look to move the issue away from social media to be discussed via a more private channel such as by email, telephone or in person.

## Appendix C – Relevant Legislation

Users should be aware of the following acts of the UK Parliament and European Court of Human Rights, or any other relevant legislation that is applicable at the time of posting to social media:

- Communications Act 2003, s127(Improper use of public electronic communications network)
- Copyright, Designs and Patents Act 1988
- Criminal Justice and Public Order Act 1994
- The General Data Protection Regulations (GDPR)
- Defamation Act 2013
- European Court of Human Rights, Article 10 – Freedom of Expression (This freedom is a human right which cannot be obstructed by a local authority unless it is in conflict with other offences such as malicious communications. Such conflicts are considered by the courts on a case by case basis)
- Freedom of Information Act 2000
- Offences Against the Person Act 1861, s 16 (Threats to kill)
- Protection from Harassment Act 1997, s 2 (Offence of harassment)
- Protection from Harassment Act 1997, s 2A (Offence of stalking)
- Protection from Harassment Act 1997, s 4 (Putting people in fear of violence)
- Protection from Harassment Act 1997, s 4A (Stalking involving fear of violence or serious alarm or distress)
- Sexual Offences Act 2003, s 14 (Arranging or facilitating commission of a child sex offence)
- Trademarks Act 1994

**Appendix D – Example Social Media Disclaimer**

Please refer to the example disclaimers below, that may be used by anyone who is connected with FTC but not posting on behalf of FTC:

- Views expressed are my own and not those of my employer. A retweet or like is not an endorsement.
- Views expressed are my own and not those of Flitwick Town Council. A retweet or like is not an endorsement.