APPENDIX 1

COMHAIRLE NAN EILEAN SIAR

POLICY ON THE
ACCEPTABLE USE OF SOCIAL MEDIA

January 2013

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 include, but are not limited to, blogs; wikis; RSS feeds; social networking sites such as Facebook, LinkedIn or MySpace; micro blogs such as Twitter; photo sharing sites such as Flickr; content sharing or bookmarking sites such as Digg and Delicious; customer feedback sites such as Yelp; and video sharing sites such as YouTube.

1.2 The use of social media can help support dialogue between the Comhairle, its partner agencies and the broader community. Such dialogue can help all parties to engage with each other and supports the Comhairle's values of openness, fairness flexibility and transparency.

1.3 The purpose of this Policy is to:

- Provide clear guidelines to employees on the use of social media;
- Set standards of good practice in the use of social media;
- Ensure employees are aware of their responsibility to comply with the law on issue including discrimination, data protection, libel and copyright; and
- Assist employees to distinguish between the use of social media in their work and personal lives.

The Policy and Guidelines do not stop employees using social media in their work or personal life. In fact all Comhairle employees with access to a Comhairle PC have access to the intranet in line with the Information Security Policy.

Instead the Policy and Guidelines should provide clarity to all employees in understanding that the behaviours expected for functioning in an electronic world are not any different from behaviours demonstrated on a daily basis in other methods of communication, such face-to-face, or via the telephone.

2. Background

2.1 Social media has become an extremely important communications channel. This technology, and the capabilities of the World Wide Web (www), often blurs the line between personal and professional communications. While this creates new opportunities for communications and collaboration, it also creates new responsibilities for individuals. Posted material can, when matched with an identity or photograph, reflect not only on the individual, but also on that individual's employer, clients, colleagues and profession.

2.2 The Comhairle has a number of policies which clearly detail the standards of behaviour expected from employees which also relate to the use of social media. These policies are detailed below, and copies can be obtained from the intranet or via your line manager:

Code of Conduct;
Equal Opportunities Policy;
Information Security Policy;
Mobile and Landline Communications Policy;
Security Policy for Laptops and Portable Devices
Whistle blowing Policy; and
Disciplinary Policy.

2.3 The supporting Social Media Guidelines clearly lay out the responsibilities of the Comhairle, line managers and employees in relation to the use of social media.

3. Professional and Personal Use of Social Media

3.1 When participating in social networking or while using social media, common sense and good judgment must be used when posting or sharing material. If not, consequences that can include, among other issues, negative publicity, regulatory attention and confidentiality or copyright concerns.

3.2 Whereas this Policy and supporting guidelines mainly apply to work-related sites and issues. It is important that all employees understand that any posted material will be available on the Internet indefinitely, and it is virtually impossible to recall or permanently or completely delete material once posted.

3.3 It is also important to understand that where material posted by an employee, either during work or in their own personal time, breaches Comhairle Policy that they may be subject to disciplinary action.

3.4 The Policy and guidance therefore provide the necessary information to help employees to make choices about the interactions and behaviours that they demonstrate online.

COMHAIRLE NAN EILEAN SIAR

GUIDELINES ON THE ACCEPTABLE USE OF SOCIAL MEDIA FOR ALL EMPLOYEES

January 2013

1. WHAT IS SOCIAL MEDIA?

Social Media includes the various online technology tools that enable people to communicate easily via the internet to share information and resources. Social media include, but are not limited to, blogs; wikis; RSS feeds; social networking sites such as Facebook, LinkedIn or MySpace; microblogs such as Twitter; photo sharing sites such as Flickr; content sharing or bookmarking sites such as Digg and Delicious; customer feedback sites such as Yelp; and video sharing sites such as YouTube.

2. WHY DO WE NEED SOCIAL MEDIA GUIDELINES?

The use of social media can help support dialogue between the Comhairle, its partner agencies and the broader community. Such dialogue in the workplace can help al parties to engage with each other and supports the Comhairle's values of openness, fairness, flexibility and transparency.

Social media have become an extremely important, and a growing communications channel, it can help people communicate quickly where an emergency arises, and be an invaluable source of professional information.

This technology, and the capabilities of the World Wide Web, can clearly be of great value in the workplace and creates new opportunities for communications and collaboration. However, social media can also often blur the line between personal and professional communications.

Consequently, using social media creates new responsibilities for employers and individuals, as material posted via social media (whether in a work or personal capacity), when matched with an identity a photograph or a workplace, reflect not only on the individual, but also on that individual's employer, clients, colleagues and profession.

The purpose of these guidelines is to make clear what each individual's responsibilities are when using social media in a work capacity, but also to highlight when these responsibilities cross into an individual's personal use of social media.

3. WHO DO THE SOCIAL MEDIA GUIDELINES APPLY TO?

The Guidelines apply to all Comhairle employees.

4. USE OF SOCIAL MEDIA RESPONSIBILITIES

Comhairle nan Eilean Siar will:

- Make appropriate social media access available to employees as appropriate to their work capacity;
- Provide appropriate intranet access to all employees as per the Information Security Policy;
- Set clear standards of behaviour expected to be demonstrated by its' employees;
- Support expected standards of behaviour via the appropriate policies, including:
  Code of Conduct;
  Information Security Policy;
  Mobile and Landline Communications Policy;
  Security Policy for Laptops and Portable Devices;
  Equal Opportunities Policy;
  Whistleblowing Policy; and

Disciplinary Policy.

- Ensure all employees receive the appropriate information/training in relation to social media; and
- Use information relating to social media to investigate allegations of abuse of social media.

Managers will:

- Familiarise themselves with the appropriate Policies in regard to the use of social media and standards of behaviour expected;
- Set and demonstrate by example standards of behaviour expected from all employees;
- Ensure appropriate social media access is available to employees as appropriate to their work capacity;
- Ensure their employees receive the appropriate information/training in relation to the use of social media; and
- Exercise personal responsibility when using social media.

Employees will:

- Familiarise themselves with the appropriate Policies in regard to the use of social media and standards of behaviour expected;
- Demonstrate expected standards of behaviour in their use of social media;
- Request appropriate information/training in relation to the use of social media; and
- Exercise personal responsibility when using social media.

5. USING SOCIAL MEDIA IN THE WORKPLACE

5.1 The Comhairle believes that important benefits can be gained from participating in two-way dialogue, and that social media enables people to express opinions and share information as part of a globally distributed conversation. While the Comhairle encourages all of its employees to join in conversations, it is important to understand what is recommended, expected and required when individuals discuss council-related topics.

5.2 Employees wanting to use social media to support their work duties should first discuss their requirements with their line manager and the IT Section. Thereafter a business case should be submitted via the Social Media Business Request Form (Appendix A) as part of the application process.

5.3 Under these guidelines managers in each area will decide what use of social media may be appropriate. Line managers should not adopt an unnecessarily restrictive approach, but ensure that employees understand their responsibilities in regards to social media use.

5.4 Line managers should bear in mind concerns about impartiality, confidentiality, conflicts of interest or commercial sensitivity. In some cases individuals may be dealing with matters so sensitive, that rules may have to be set on what they can and cannot talk about using social media.

5.5 The business case should include details of:

- What is wished to be communicated and what target audience.
- The aims for the social network or blog and why a social network or blog is the right platform for communicating the messages.
- What other channels of communication to be used to support your use of social networks.
- How often it is intended to update/check the social network or blog.
- Which other officers will have access to edit the social network or blog when the main named individual is unable to update it due to sickness/annual leave.
- How the main named individual intends to keep records of the data that is posted onto your social media site or blog.
- The commitment to updating the social network or blog to clearly state when the main named individual no longer works for the authority or handing over the site to the person who takes over the role.
- The commitment to reviewing the social network or blog and providing the line Manager and the Communications Officer with data on a regular basis to ensure the social network or blog is being used effectively and reviewed regularly.

5.6 This request, once discussed with the line managers and communications officer, who will consider indicating approval, or refusal, of the request along with supporting advice. If the request is authorised, the main named individual will be required to sign a Social Media User Agreement (Appendix B), detailing the additional responsibilities in line with this these guidelines.

5.7 In addition to employees requiring ongoing business access to social media, there may be occasions where access is required for a specific purpose and set timeline. For example to investigate particular issues such as a line manager dealing with allegations of online bullying. Requests for temporary access should be made as detailed from 5.2 above.

5.8 Where an employee is approved to use social media for any purpose, and subsequently contacted by the media or press contacts about posts made using social media, the Communications Officer should be contacted immediately.

5.9 Additionally, all information posted by employees using social media is subject to the Freedom of Information Act. As such the following principles, which form part of the Information Security Policy in that must be adhered to:

- The main named individual is responsible for keeping appropriate records.
- All information created as part of an employee's job role constitutes a Comhairle record, is evidence of the Comhairle's work, and may be needed for reference by others in future.
- All information is subject to a retention period, specifying how long it must be kept.

6. USING SOCIAL MEDIA FOR BUSINESS USE

When employees are using social media in the workplace they have a responsibility to use this in an appropriate manner. The following points should help guide employees and additional guidance on social media content and etiquette is attached at Appendix C:

- **You should not use any social media tool for Comhairle business unless you have received appropriate training.** You must apply for and be registered on the approved business social media user list held by the Chief Executive;

- If having read this document you are still uncertain about the appropriateness of publishing something online, it is best to **hold back and seek the advice** of your line manager and the Communications Officer. Also bear in mind the Comhairle's Information Management Guidelines.

- Many people post online working anonymously, using pseudonyms. The Comhairle discourages this in all forms of online participation that relate to the Comhairle. We believe in transparency and honesty. If you are posting about your work for the Comhairle, we encourage you to **identify yourself, be clear who you are, and identify that you work for the Comhairle.** If you have a vested interest in something you are talking about, ensure you have made this clear. What you publish will be around for a long time so consider the content carefully and also be sensible about disclosing personal details.

- **Follow copyright and data protection laws.** For the Comhairle's protection as well as your own, it is critical that you stay within the legal framework and be aware that libel, defamation, copyright and data protection laws apply. Ask permission to publish or report on conversations that you take part in at work. Be aware that content on social media websites may be subject to Freedom of Information requests.

- Remember that if you **break the law** using social media (for example by posting something defamatory), you will be personally responsible. You may also be subject to the Comhairle's Disciplinary Procedure.

- The Comhairle's reputation is made up in a large part by the behaviour of its employees, and everything you publish reflects on how Comhairle nan Eilean Siar is perceived. Social media should be used in a way that **adds value** to the Comhairle's business. If it helps you, your colleagues, our citizens or our partners to do your jobs and solve problems; if it enhances the Comhairle's services, processes and policies; if it creates a sense of community; or if it helps to promote the Comhairle's aims and values, then it is adding value.

- Though not directly Comhairle-related, background information you **choose to share** about yourself, such as information about your family or personal interests, may be useful in helping establish a relationship between you and your readers, but it is your decision to share this information. You should be aware that by revealing certain details you might be more vulnerable to identity theft.

- **Don't be defensive.** When you see inaccuracies articulated about the Comhairle by citizens, journalists or by other bloggers, you may use social media channels - or join someone else's - to politely and sensitively point out the situation as you see it. You must also let your communications adviser know that you have identified information that is inaccurate or could damage the reputation of the organisation.

- **Be prepared for a two-way conversation.** And be aware that people are entitled to their views. You must make sure that what you say is factual and avoid becoming involved in unnecessary or unproductive arguments.

- If a conversation turns and becomes offensive in terms of language or sentiment, handle this **swiftly and with sensitivity**, remove the comment(s), and make sure you inform your audience exactly why you have done this. A few sentences should suffice, along the lines of: **"**This comment was removed because the content was offensive. Comments are welcomed but please respect the views of everybody who comes here."

- If you make a mistake, **be up front about your error and correct it quickly**. If you choose to modify an earlier post, make it clear that you have done so. Remember that there are consequences to what you publish. If you're about to publish something that makes you uncomfortable, review the suggestions in this document. If you're still uncertain, discuss it with your manager or with the Communications team.

- Be mindful that social media sites can be used to distribute malware, i.e. viruses. Employees should be aware that downloading applications or accessing links, for example the use of shortened urls in Twitter, can fool users into accessing unsuitable or malicious sites. So **take care with shortened urls**, unless you are following as organization or individual you can trust.

7. USING SOCIAL MEDIA FOR PERSONAL USE

As the use and popularity of social media grows, the lines between what is public and private, personal and professional have blurred. The Comhairle respects their employee's right to personal use of social media out-with the workplace.

However, each employee should be aware that actions in and outside work that affect the individual's work performance, the work of others, or adversely affect the Comhairle's reputation, may become a matter for the Comhairle.

Considering the following points may help avoid any conflict between your personal use of social media and employment with the Comhairle:

- If you already use social networks or blogs for personal use and you have indicated in any way that you work for Comhairle nan Eilean Siar you should **remove these.** The personal image you project in social media affects your **reputation** and may affect the reputation of Comhairle nan Eilean Siar. Sounding off about the Comhairle, even on a personal blog can be damaging. By identifying yourself as a Comhairle employee within a social network, you are connecting to your colleagues, managers and even Comhairle citizens.
- When using social media for personal purposes, you must not imply you are speaking for the Comhairle. Avoid use of the Comhairle e-mail address, Comhairle logos or other Comhairle identification. Make it clear that what you say is representative of your views and opinions and not necessarily the views and opinions of the Comhairle.
- You must comply with other **Comhairle policies** when using social media. For example, you should be careful not to breach Comhairle confidentiality and information security or information management policies, or the Comhairle's Code of Conduct. If in doubt, don't post it.
- Don't make the mistake of thinking that everyone linked to your page is actually your "friend", **don't include sensitive personal details** like your employer or your address. Your real friends already know, and you should choose carefully who else you give that information to.

- Be mindful of your **privacy settings**, if you want the world to see what you are doing and saying, be aware that you could be held accountable for it.
- Remember if you **associate yourself** with another Facebook user or site you could be linked with postings and contents on that page.
- Racism, sectarianism or other types of discrimination are **unlawful and are not acceptable** in any context. Putting these comments on line effectively puts them in print.
- **Follow** copyright and data protection laws, as libel, defamation and data protection; laws apply to you.
- Use your **common sense**, social media is a great way of keeping in touch with friends and family, just be sure you enjoy it sensibly.

8. NON COMPLIANCE WITH SOCIAL MEDIA POLICY AND GUIDELINES

Expectations of employee's behaviour when interacting with social media are no different from expectation of their behaviour when dealing with other methods of communication, such as face-to face or on the telephone.

However, as with all other forms of communication, there may be circumstances where an employee's participation with social media is brought to the attention of the Comhairle. An example of this may be on receipt of a formal complaint or via some form of publicity. In these circumstances, and dependant on the nature of the complaint this may require further investigation, and may be subject to the Comhairle's Disciplinary Procedure.

Some examples of where this may occur are detailed below:

- Abuse or breach of any Comhairle nan Eilean Siar Policy or rule by which employees are bound to comply with.
- Serious misuse or abuse of Comhairle computer systems and non-compliance of security policies.
- Being charged with a serious criminal offence and/or an offence involving dishonesty, which, in the view of the Comhairle, affects the employee's suitability for continued employment.
- Indecent, violent or offensive behaviour, while working on behalf of the Comhairle, including the viewing, downloading and/or circulation of offensive or sexually explicit material.
- Harassment, bullying, discrimination, intimidation or victimisation against any individual(s) whilst working on behalf of the Comhairle, or which can be connected to work by bringing the name of the Comhairle into disrepute.
- Behaviour during working hours and in some cases out-with working hours, which brings the name of the Comhairle into disrepute.
- Inappropriate disclosures of confidential information. For example information disclosed without the express consent of an individual, or disclosure of Comhairle nan Eilean Siar information to external organisations, which breaches Comhairle policy or legislation, unless covered by "The Public Interest Disclosure Act" or any other Act.

Employees should also be aware that where there is a serious breach of the Comhairle's Social Media Policy, that the Comhairle may be obligated to report these to the Police, for example making racial or sectarian comments.

Employees should also be aware that where they have a complaints or a grievance against either a colleague or the Comhairle, that there are formal procedures in place for progressing these.

9. FURTHER ADVICE AND GUIDANCE

If you require more advice and guidance on the Comhairle's Social Media Policy and Guidelines please contact the Communications Officer.

APPENDIX A

2013 *CONFIDENTIAL*	
SOCIAL MEDIA BUSINESS REQUEST FORM	

EMPLOYEE DETAILS (MAIN NAMED EMPLOYEE)			
Employee Name		**Post Title**	
Work Location		**Work Phone No**	

MANAGER'S DETAILS			
Name of Manager		**Post Title**	
Work Location		**Work Phone No**	

Please state the Social Media access requested.

Please detail the business case for access to the social media requested.

Employee Signature:

…….. Date: .....

Head of Service Signature:

…….. Date: .....

Comments from Communications Officer

The Chief Executive agrees / does not agree (delete as appropriate) the requested social media access.

Chief Executive Signature:

…….. Date: .....

APPENDIX B

COMHAIRLE NAN EILEAN SIAR

Social Media Business User Agreement

I have read and understand the terms and conditions of the Comhairle nan Eilean Siar Social Media Policy and Guidelines. I agree to comply with Policy and Guidelines.

This Social Media User Agreement sets out the rules for the proper use of social media by all Comhairle nan Eilean Siar employees. I understand that failure to comply with the Policy and Guidelines this may result in disciplinary action being taken against me.

Your name: .....

Signature: .....

Post held .....

Date: .....

Head of Service Name .....

Signature: .....

Post Held: .....

Date: .....

Business Support Section, IT

Senior Analyst .....

Signature: .....

Post Held: .....

Date: .....

Completed form to be returned to Human Resources Section

APPENDIX C

Social Media Content and Etiquette

Guidance on how to post and respond

This Appendix provides advice on how to communicate using social media channels on behalf of Comhairle nan Eilean Siar. It includes details of how to respond to various posts by our audience, whether they be an attack, a compliment or a query.

It also outlines the approach to providing good quality and clear information to ensure everybody is able to join in. The key to communicating effectively is being clear and allowing people of all abilities to understand the terminology you use.

Your content should be informative, interesting and if appropriate entertaining.
When posting information using your social network:

- Always ensure everything you post is in plain English. If you must use jargon or technical terms explain what it means or link to a webpage that explains what it means.
- Don't use acronyms – state the full term you are referring to. Don't assume everyone knows the workplace terms that you do. Jargon can make many people switch off from the point you're making.
- Be charming – your conversation will be much more successful if you are kind, appreciative of the time your 'friend or follower' is giving you and not defensive. No matter how confrontational someone is, keep your tone understanding and friendly.
- Ask questions – your content will be much more engaging if it is framed as an invitation for people to comment.
- Always link to more information where possible – for example if you are talking about your Service, make it an active link by inserting a hyperlink to your pages on the Comhairle nan Eilean Siar website.

How to Handle Responses

Here are three main types of response - query, attack and compliment - and how to handle them.

1. Attack

Example: "Your tweets are completely irrelevant to me and everyone. This Facebook page is patronising"

Understand why this is being said. Remember it can be frustrating for people if they think they're dealing with an organisation that isn't useful or fair. Acknowledge that there will always be an opposite point of view.

Link to webpage/blog for full explanation. i.e. "We understand your point but we are doing our best to be a useful resource for residents/businesses. We'd love to hear how we can improve. Info here: www.xxxx.gov.uk "

Follow up with fresh post stating your position for everyone to see. If one person thought it, many others might too. This is your chance to tell people why your

department/project behaves as it does. The ‘attacker’ has done you a favour by drawing your attention to their point of view.

Above all - aim to answer everything. In most cases, you can say a minimum of “Thanks for your comments, which have been passed on to the Head of Service.”

2 Compliment

Example – “Great to see you’re helping us understand how the youth service is run.”

say thanks – when we’re angry we’re more likely to make ourselves heard so when someone makes the effort to compliment it warrants a ‘thanks’. This person should mean a lot to you as a valued citizen/ member of the workforce.

Ask if you can use their statement in promo material:

“Thank you, glad you like the offices! Would you mind if we quote you in our promotional material about this project? Not a prob if you’d rather keep it between us :-)”

3 Query

Example - “What does your website mean when when it says ‘uphold public trust’?”

If you don’t know the answer, say so! The medium is immediate and expectations are higher. Give a timeframe for when it will be answered. Stick to it. Otherwise they might feel ignored.

“I’m not sure of the best answer to this, will check with our team and be back to you.”

Ideally you would link to more info on the web to answer further. If you can answer in one post, do it –

“Hi, it basically means we should be open and ensure we are doing things the way people would expect us to. More info is here www.blog.com/codefive.

Repost the info to everyone - thank original questioner for bringing it to your attention.

4 Other principles of communication:

How to remove bad/offensive postings

Bad language or anything we think might contravene libel, defamation, copyright and data protection laws should be removed. Any post that has been removed should be replaced with a statement along the following lines:

“We removed this post because it contained bad language/personal information. We want everyone to get involved and join in the conversation but also we should all be able to use this page with out being offended.”

Admit mistakes and don't delete!

Being open makes you more trustworthy. If, for example – you made a spelling error, just repost saying “Oops, I made a spelling error, I meant to say ‘council’ nor ‘cuoncil’!”. This way, people know that you are not trying to hide anything.

Small talk isn't a waste of time

If you were talking face to face you'd talk about a few niceties - weather, local events, enquiring after health. A bit of this shows a human face to the project and helps people to warm to you. It can help you establish relationships.

Believe in your community. If you've built a strong community they will stand up for you if someone oversteps the mark. Informed followers/friends/fans may get involved in a conversation if they spot another member of the community posing another point of view.

Monitoring

If you spot anything outside of your community - get involved but be extra polite. So:

“Hope you don't mind me joining in but noticed you liked our... etc.'

Getting in on online chats is easier than in the real world but manners always help.