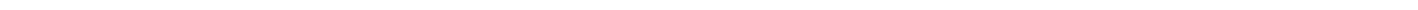
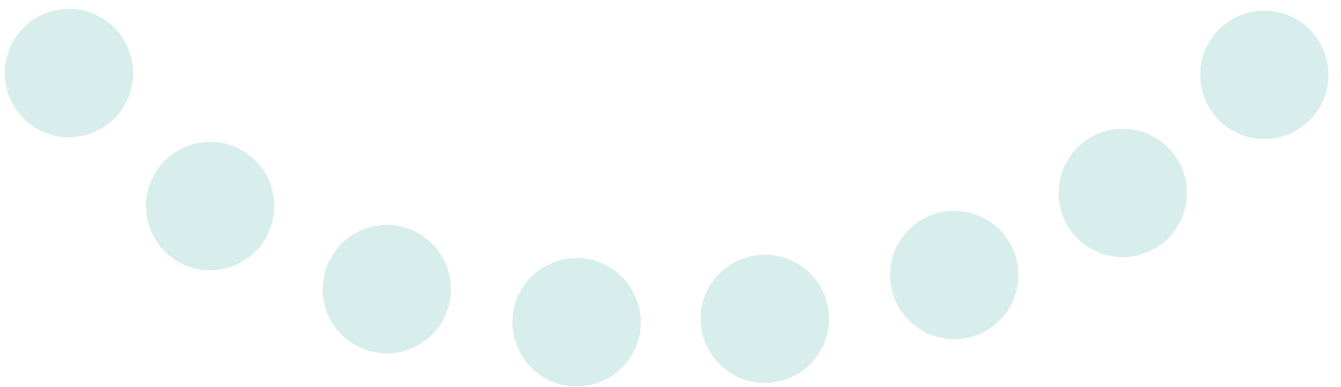




Hinckley & Bosworth
Borough Council

Social Media Policy and Guidelines



1.0 Purpose

- 1.1 The purpose of this Social Media Policy is to set out guidelines for those who work for, or are associated in any way with Hinckley & Bosworth Borough Council (HBBC) and [includes a section written for council members](#). This policy sets out a fair, transparent, and practical measure that will contribute to the protection of the council and employees' credibility and reputation.

2.0 Scope

- 2.1 This procedure applies to all employees, council members, agency workers and those undertaking duties for or on behalf of HBBC as well as partners working with HBBC. Suppliers and service providers will be made aware of their duties and responsibilities during the procurement process.

3.0 Principles

- 3.1 This policy deals with the use of all forms of social media, including: Facebook, LinkedIn, Twitter, YouTube, Instagram, TikTok, Nextdoor all other social networking sites, and all other Internet postings, including blogs.

It applies to the use of social media for both business and personal purposes, whether during office hours or otherwise.

This policy applies regardless of whether the social media is accessed using:

- IT facilities and equipment provided by HBBC
- Equipment belonging to you or others,
- A smart phone,
- Any other device that can be used to access the internet

3.2 Social Media and the Law

The public nature of social media raises some general legal issues which ALL users should be aware of:

- **Libel:** If you publish an untrue statement about a person which is damaging to their reputation, they may take a libel action against you. A successful libel claim against you will result in you having to pay damages to the person you libelled.
- **Copyright:** Placing images or text on your site from a copyrighted source (for example extracts from publications or photos) without permission is likely to breach copyright. Avoid publishing anything you are unsure about, or seek permission in advance. Breach of copyright may result in you having to pay damages to the person whose work you used. The communications team can supply you with original images or royalty free images if required for council purposes.
- **Data Protection:** Avoid publishing the personal data of individuals unless you have their express permission. Breaches can be reported to the ICO (Information Commissioner's Office) and can result in unlimited penalties for the council.
- **Photography and video:** Images of people are personal data so care must be taken when publishing photographs of people on social media. You must seek consent before publishing photographs of individuals. If photos or film is to be recorded in a public place then you must warn the public of this using your best endeavours and offer people the choice to opt out of being filmed.
- **Safeguarding children, young people and vulnerable adults:** Staff who have direct or indirect contact with children, families and vulnerable adults in the course of their work have a

responsibility to safeguard and promote the welfare of vulnerable adults and children. You should bear this in mind in your social media activities. Promote online safety and make sure that your content is suitable. Never ask users to divulge any personal details, including their home address, email address, school name or mobile phone number.

- **Regulation of Investigatory Powers (RIPA) Compliance:** Officers must consult the Council's RIPA policy before using HBBC social media accounts to undertake surveillance or investigations to ensure any activity is compliant.

4.0 Policy

1. Employees may be required to remove immediately any Internet postings and social media communications which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action, including dismissal.
2. Employees are reminded of their contractual duty and mustn't make statements that could be construed as being damaging or detrimental to the reputation of HBBC. They must not post or communicate disparaging or defamatory statements using social media or otherwise about:
 - Our employees
 - Our councillors
 - Our clients, customers or tenants
 - Our suppliers, their agents or contractors
 - Our services

Politically restricted posts

Officers in politically restricted posts must not publicly express support for a political party, including, but not limited to, activity on social media. This includes all social media activity, irrespective of any privacy settings that may have been applied. The HR team can advise which posts are designated as politically restricted.

3. There are specific policies for addressing individual's concerns that relate to Whistle Blowing, Grievances and or Bullying and Harassment allegations. Social Media must never be used in place of the formal policies which do offer individuals elements of legal protection. Employees are personally responsible for what they communicate via social media. Employees must be aware that anything they publish might be read or accessed by an audience wider than intended. Employees should ensure that any social media posting is communicated on their own behalf and does not appear to be linked with Hinckley & Bosworth Borough Council in any way.
4. Employees must not post comments about sensitive or confidential business-related topics.
5. Any alleged breach of this policy will result in a full and thorough investigation which may lead to disciplinary action being taken, and this may include dismissal. Disciplinary action may be taken whether:
 - the breach is committed during working hours or not,
 - it was intended or not; and
 - regardless of whether Hinckley & Bosworth Borough Council equipment was used for the purpose of committing the breach.

If an employee is suspected of committing a breach of this policy, they will be required to co-operate with

the investigation, If you become aware of a breach of this policy, you must notify your manager or HR immediately.

6. It is the responsibility of all employees to read and understand the guidelines provided with this policy.

Social Media Guidelines (to be distributed to staff)

Introduction

Code of Conduct and Acceptable Usage Policy for Email, the Internet and Corporate Network Access provides the foundation for the following Social Media Guidelines for employees of Hinckley & Bosworth Borough Council.

As outlined in the Officers' Code of Conduct, as a responsible employer, the council fully respects that, in general, what staff do on their own time is their affair. However, activities in or outside of work that affect job performance, the performance of others or the council's reputation are a proper focus for council policy.

That's why the same principles and guidelines that apply to HBBC employees activities in general, as found in the Officers' Code of Conduct, apply to employees' activities online. As such, a serious breach of these guidelines will be treated as a disciplinary matter.

Definition of social media

For the purposes of these guidelines, social media is held to include:

- Blogs (e.g. Wordpress, Tumblr, Blogger)
- Micro-blogging (e.g. Twitter)
- Forums
- Networks (e.g. Facebook, LinkedIn, Nextdoor)
- File, image- and video-sharing sites (e.g. YouTube, Instagram, Tiktok)

New social media tools are being created all the time, so this list is not exhaustive.

The council's social media accounts on twitter, Facebook, LinkedIn and Instagram are accessible only to the Communications Team and HBBC social media trained users.. Any new social media accounts for HBBC services or groups should only be created following agreement from SLT through the Communications Team. New profiles and groups will only be agreed if:

- A clear business need can be proven
- Sufficient resources are made available to maintain the account and respond to feedback generated by the service/project lead.

The service area will be responsible for regularly updating the profile/group to ensure its content remains fresh and relevant.

The council recognises that many employees make use of social media in a personal capacity. While they are not acting on behalf of Hinckley & Bosworth Borough Council and may not identify themselves as a Hinckley & Bosworth Borough Council employee, employees must be aware that they can damage the organisation if their conduct on social media is unacceptable.

These guidelines aim to provide helpful, practical advice to protect both the employer and the employee using social media sites – whether that is inside or outside of work.

Social Media Guidelines

1. All council employees are bound by the Officers' Code of Conduct and Acceptable Usage Policy for Email, the Internet and Corporate Network Access.
2. The principles covering the use of social media by council employees in a personal capacity are the same as those that apply for any other media. Social media is a public forum and the same considerations apply as would, say, to speaking in public or writing something for publication either officially or outside of work.
3. Every employee is considered to be personally responsible for the content they publish online. This may mean that information published online will remain public for a long time and may still be seen after it has been deleted. In social media, the boundaries between professional and personal can sometimes become more blurred – so it's important to be particularly careful. If you're about to publish, share or be seen to react to something that makes you even the slightest bit uncomfortable, and it is related to the council, feel free to discuss it with your manager or the Communications Team first. Ultimately, however, you have sole responsibility for what you post, publish, share or react to in any form of online social media.
4. Council employees and councillors receive a great deal of information relating to the council's business, as well as confidential information about customers, businesses, councillors and other employees. Much of this information needs to be treated as confidential and should not be disclosed either inside or outside work, even to family and friends without authority. In the same way, such information should not be disclosed on social media, even to colleagues, as this can be viewed publicly by others. Similarly, you should not publish anything that might allow inferences to be drawn which could embarrass or damage a customer, councillor or another employee.
5. Be aware of your association with HBBC in online social networks. If you identify yourself as a HBBC employee or if you can be identified as an HBBC employee such as by your association with work colleagues on social media sites, you should ensure your profile and related content is consistent with how you wish to present yourself to colleagues and customers:
 - a. Don't use racist, sexist or other bigoted language, personal insults, obscenity, or engage in any conduct that would not be acceptable in your workplace, for example by:
 - Making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age
 - Using social media to bully another individual (such as an employee of the organisation)
 - Posting images that are discriminatory or offensive or links to such content.
6. Although many social media accounts allow users to adopt a made-up identity, if you choose to use a pseudonym, be aware that your true identity is likely to be revealed over time through the content you publish and your contact with others. If talking about the council, staff and councillors should be clear about their own personal role and the service that they represent and not say anything that might bring the council into disrepute.
7. You must show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory—such as politics -which might be seen to compromise your impartial service to the council.
8. Don't use online social media to air your differences in an inappropriate manner.
9. Take care about commenting on council policies or practices and avoid commenting, sharing or reacting altogether to controversial issues:

- a. Do not deny or affirm work-related rumours (or suggest the same in subtle ways) or speculate about them in any way.
- b. Be careful about expressing any political comment or showing support for a political party or councilor in a way that may compromise the reputation of the council or appear to put the council in a conflict of interest.

10. Think carefully before you take photos or video while you are working. You must:

- Ensure you have the consent of your manager to be recording film/photos while at work.
- Check you have consent of everyone involved before you share photos or video footage recorded while you are working on your personal social media accounts. You must be certain that everyone in the images – colleagues or members of the public – has granted consent for it to be published on social media.
- Ensure you are not breaching confidentiality or privacy or revealing information that has not yet been shared widely.

Make sure that anything you post is appropriate conduct in the workplace and does not bring the council into disrepute.

11. If you do choose to publish appropriate content online relating to the council or council matters in your personal capacity, you must make it clear that you are speaking for yourself and not on behalf of the council. You should use a disclaimer such as this: "The postings on this site are my own and don't necessarily represent the opinions of Hinckley & Bosworth Borough Council". It remains the case that some topics relating to the council are confidential and should never be discussed, even if you're expressing your own opinion and using a disclaimer.

12. Pre-election period

During pre-election periods - which are always announced well in advance – stricter rules apply to all staff, irrespective of whether or not they are in politically restricted posts.

During this period, officers must avoid any action which is, or may reasonably be perceived as being, supportive of any party or candidate, and must not engage in party political activity that compromises their neutrality and objectivity at work.

So far as social media is concerned, officers must not engage in any activity which may be seen, or perceived, as being supportive of any political party or campaign. This is irrespective of any privacy settings that may have been applied

13. Excessive use of social media at work

Staff should not spend time while at work using social media websites unless it is for work related purposes.

14. Monitoring use of social media during work time The council reserves the right to monitor employee's internet usage. For full details see the council's [Acceptable Usage Policy for email, the internet and corporate network access.](#)

15. When you see misrepresentations made about the council by the media or others, you may choose to add comments on the original discussion to point that out. Always do so with respect, stick to the facts and identify your affiliation to the council. You must make sure that what you say is factual and that it does not disparage others. This does not mean that you have to put up with rude or offensive remarks being made to you, but if you choose to reply, you should do so in the same professional way as you would if those remarks were being made to your face or over the phone.
16. If you hear something on social media that you need to feed back to colleagues, then please pass that information on to the relevant person. For instance, if you come across people complaining that the website isn't working, please pass that information on to the Communications Team to rectify.
17. Don't use the HBBC logo unless approved to do so.
18. Respect copyright laws when posting any material, particularly photographs. For advice contact the Communications Team.
19. Ensure that your online activities do not interfere with your job, your colleagues or commitments to customer. If you are not using the site as part of the job, you should always access social media sites in your own time.
20. Authorised users should not spend more time using social media sites in the course of their employment than is necessary for the purpose of council public communication. Priority should be given to sites which are widely used by the general public.
21. If you update open access editable sites such as wiki, then be aware that most wiki sites record the IP address of the editing computer. Alterations to wiki sites may appear as if they have come from the council itself. Officers should not act in a manner that may bring the council into disrepute and should not post derogatory or offensive comment on any online wiki sites.
22. Make sure you maintain boundaries between personal and professional lives by avoiding inappropriate personal information becoming visible to members of a group or followers of a social media account, such as by tagging an employee's private social media account on one of the council's posts.
23. Remember that the laws of defamation and harassment apply to social media in the same way as written or spoken communication. This means that individuals can sue you personally for damages if they consider their reputation has been or may be harmed or if your posts constitute harassment.
24. Remember to keep your manager and other relevant officers updated on your work and to flag in appropriate content to the communications team.
25. Employees should note that any breaches of this policy could lead to disciplinary action. Serious breaches of this policy, for example any reported incidents of bullying of colleagues, or social media activity causing serious damage to the council, will be investigated and if found to constitute gross misconduct, could lead to summary dismissal.

Social Media Guidelines for Councillors

Welcome to your social media guidance - we want you to use this guide to help you get the best out of social media.

We want to encourage you to use social media and give you the freedom to support the council with the proper guidelines.

Social media is a website or app that helps you create and share content and communicate with others. Social media platforms include Facebook, Twitter, Instagram, TikTok, Snapchat, WhatsApp, LinkedIn, YouTube, Flickr and Nextdoor. It also includes SharePoint and Teams. This list is not exhaustive and consists of any platform, website and application that focuses on communication, community-based input, interaction, content-sharing and collaboration. The guidance also covers any new platforms which will be developed in the future. You should follow this guidance if you're an elected member of Hinckley & Bosworth Borough Council. It's also applicable to candidates who are standing to be elected to Hinckley & Bosworth Borough Council. For information, throughout this guide, the terms 'we' and 'us' are used to describe the Communications Team.

Key points:

- Whatever you say on social media, you're likely to be considered as representing your role as an elected member of Hinckley & Bosworth Borough Council— even when on your own personal pages. We want you to feel confident and safe using social media as a communication channel.
- When posting on social platforms, your integrity is on display for people to see, so be ethical, respectful, truthful, and decent. Anything you publish must be true, not misleading, and all claims must be substantiated and approved.
- Protecting the reputation of Hinckley & Bosworth Borough Council is an essential part of your role as an elected member. Do not post any confidential information on any social platforms. If the council has not officially released the information, don't discuss it. This includes financial data, service data and information, and legal information.
- If you're unsure whether to post, comment on or share something, err on the side of caution and don't.
- Your interactions with the public can be used and re-used on social media. This could include emails, pictures and videos. Bear this in mind in how you interact and respond to the public in your day-to-day role.

Your personal social media pages.

You may have separate social media pages – one as an elected member and one as your own personal page.

We want you to be proud to be an elected member of Hinckley & Bosworth Borough Council. This is fine if you want to show this on your own social media pages as part of your own profile. It's good practice to have a disclaimer to clarify that comments are your personal views and do not represent the council's view. This makes it clear that you may understand the council better, but you're not making official declarations. Use wording in your profile such as 'Views expressed are my own and not in my role as a councillor'. If you're carrying out a legitimate role that involves posting comments on social media, for example, as a community action group representative etc., you need to make clear in which capacity you're posting.

Using social media for council business

Councillors should be mindful that posts, tweets or comments on social media about the council or your role as an elected member are treated the same way as any other communications. They are covered by your Code of Conduct

for Elected Members – you will note the latest code of conduct includes a section on the use of social media for council business. If anyone considers that your posts, tweets or comments on social media have failed to comply with the Code of Conduct for Elected Members, you may be subject to a complaint to the council’s monitoring officer.

Your responsibility when using social media

Even if you’re using your personal social media page, the world will always see you as a reflection of the council. Anything you post on a social media site is your responsibility. This includes content you create, share, and people’s comments and reactions linked to your content. Content can be there permanently, regardless of whether you try to remove it. There’ll always be a permanent record of everything you post. Irrespective of your privacy settings, posts can, and often do, become publicly available through screenshots, hacking and other methods.

Bias and pre-determination: If you are involved in determining planning or licensing applications or other legal decisions, avoid publishing anything on social media that might suggest you don’t have an open mind about a matter you may be involved in determining. Otherwise, the decision runs the risk of being invalidated. Members of a Planning Committee need to avoid any appearance of bias or of having predetermined their view before taking a decision on a planning application. There is an important difference between predisposition and predetermination. Predisposition is where a councillor may have campaigned for or against a proposal or expressed an initial view. However, if the councillor is clear they have an open mind and are willing to listen to all the arguments and evidence presented at the Planning Committee before deciding on how to exercise their vote, there is no predetermination. Predetermination goes beyond predisposition and is where a councillor has a closed mind and is not prepared to listen to any other viewpoint. Councillors are advised to seek advice from the monitoring officer.

Although people have differing views on many issues, any form of online bullying is not acceptable on any platform. Consider what you’re posting, how you manage your page, and how this may reflect the council's values and reputation. Do not engage in content that could be perceived as online bullying and brings the council into disrepute or has the potential to adversely affect the council’s reputation or business. This includes content you create, share, and people’s comments and reactions linked to your content. Online bullying includes inappropriate content concerning the council’s services, council employees and other elected members, residents, businesses, customers or suppliers. You’ll be asked to remove the content, and the council may investigate and start disciplinary action against you. Depending on the content, we may also report it to Leicestershire Police.

Dos and don'ts at a glance (adapted from the LGA website)

- Do:**
- talk to residents, staff and others. And do answer their questions (quickly and honestly)
 - be responsible at all times
 - be respectful at all times, too
 - have a personality – corporate speak or just issuing press releases won't work well on social media
 - share other people's helpful content and links
 - share photographs, images, video footage and comments of elected members or employees with their consent and within UK GDPR regulations.
 - credit other people's work, ideas and links
 - listen (social media is designed to be a two-way channel, just like any good conversation)
 - ask your own questions. Seek feedback from your residents (but make sure you share the results with them)
 - adhere to your existing HR policies such as the Code of Conduct for elected members and this social media guidance
 - understand your responsibility for the content you create, content you share, and people’s comments and reactions linked to your content
 - check your privacy settings and make sure you understand what people can see and what they can do with your

content.

- follow the council's Information and security and computer usage policy and Code of Conduct for elected members when using council equipment and your council login.
- talk to your communications team – they are there to help you
- and more than anything, do use social media in the spirit in which it was intended – to engage, openly and honestly.

Don't

- broadcast or talk at people. Your residents will soon spot broadcasts and respond accordingly
- block social media – social media is not a risk, blocking its use is a risk
- raise council-related issues on social media. Use the process in place to get more information and facts
- say things that could damage the council's reputation or other organisations or brands associated with the council
- divulge confidential information about, or belonging to, the council, people who use our services, employees or other elected members.
- impersonate other elected members or employees on social media sites and forums
- try to cover up mistakes, be honest and you'll get more respect for it in the long run
- build accounts and just hope people will come – sometimes it is best to go to the places where your audiences are already having conversations
- assume that social media will look after itself – you will need to invest time, enthusiasm and energy to make it work. And don't leave your accounts unattended for long spells
- ignore legal advice, it's there to help you
- think that a disclaimer in your bio will save you from potential legal action, it won't
- share your passwords with anyone

Legal guidance on using social media

Comments made on a public forum are in the public domain. Updating your site settings to private will not protect you if you're found in breach of this guidance. Consider whether your comments or actions could be considered defamatory, derogatory or offensive, as this could result in somebody taking legal action against you as well as against the council or making a formal complaint about you. If someone is taking legal proceedings against an elected member or employee because of their defamatory comments or actions on a social media site or online media outlet, the council is entitled, in appropriate cases where the person has acted reasonably and in good faith, to support them in defending those legal proceedings. Tribunals and courts can consider communications recorded on social media sites. It's highly likely that online content, postings and messages will be used as evidence, regardless of the privacy settings of your page.

Breaches of the Code of Conduct for elected members renders you liable to action being taken by the Ethical Governance & Personnel Committee. Failure to observe the conduct and behaviour specified in this code may also render you liable to disciplinary action being taken by your own political group.

Be aware of UK GDPR regulations and consent.

People are free to express their opinion, and most people who follow our pages do this in a balanced way. It's okay for people not to like the service we deliver or to disagree with decisions, and they are free to communicate this. We won't act against these comments, as frustrating as they may be. We do not accept content that is defamatory, slanderous, discriminatory, inciting intimidatory behaviour, or is classed as misinformation (false, misleading or out-of-context material regardless of the motivation behind it) or disinformation (a deliberate attempt to mislead using material that the deceiver knows is untrue, designed to be widely shared).

Managing unacceptable content on social media pages

Our council social media pages are governed by our social media acceptable use policy (social media house rules). It covers all of the council's pages and outlines the standards we expect on our social media sites; it's a key enforcement step in establishing a positive behaviour change on online channels.

The LGA has a Councillors' guide to handling harassment, abuse and intimidation. If you need information or support, please contact the communications team, the democratic services team or the monitoring officer at the council.