
Headteacher: Mr James Procter

Email: jprocter@easthoathly.e-sussex.sch.uk
head@chiddingly.e-sussex.sch.uk

Email: office@easthoathly.e-sussex.sch.uk
office@chiddingly.e-sussex.sch.uk

1 INTRODUCTION

1.1 The internet provides a range of social media tools that allow users to interact with one another, for example from rediscovering friends on social networking sites such as *Facebook* to keeping up with other people's lives on *Twitter* and maintaining pages on internet encyclopaedias such as *Wikipedia*.

1.2 While recognising the benefits of these media for new opportunities for communication, this policy sets out the principles that East Sussex County Council's staff and contractors are expected to follow when using social media.

1.3 It is crucial that the public has confidence in the County Council's decisions and services. The principles set out in this policy are designed to ensure that members of staff use social media responsibly so that confidentiality of personal and other sensitive information and the County Council's reputation are safeguarded. Staff must be conscious at all times of the need to keep their personal and professional lives separate.

2 SCOPE

2.1 This policy applies to all County Council contracted and non-contracted staff, external contractors providing services on behalf of the County Council, trainees, volunteers and other individuals who work for or provide services on behalf of the County Council. These individuals are collectively referred to as 'staff members' in this policy.

2.2 This policy covers personal use of social media as well as the use of social media for County Council work purposes, including sites hosted and maintained on behalf of the County Council (see sections 5, 6 and 7).

2.3 This policy applies to personal webspace such as social networking sites (for example *Facebook*, *MySpace*), blogs, mircoblogs such as *Twitter*, chatrooms, forums, podcasts, open access online encyclopaedias such as *Wikipedia*, social bookmarking sites such as *del.icio.us* and content sharing sites such as *flickr* and *YouTube*. The internet is a fast moving technology and it is impossible to cover all circumstances or emerging media - the principles set out in this policy must be followed irrespective of the medium.

3 LEGAL FRAMEWORK

3.1 The County Council is committed to ensuring that all staff members provide confidential services that meet the highest standards. All individuals working on behalf of the County Council are bound by a legal duty of confidence and other laws to protect the confidential information they have access to during the course of their work. Disclosure of confidential information on social media is likely to be a breach of a number of laws and professional codes of conduct, including:

- Human Rights Act 1998
- Common law duty of confidentiality
- Data Protection Act 1998, and
- General Social Care Council Code of Practice for Social Care Workers.

Policy: Social Media policy

Date: July 2015

Reviewed: November 2017, annually

Co-ordinator: Head

Headteacher: Mr James Procter

Email: jprocter@easthoathly.e-sussex.sch.uk
head@chiddingly.e-sussex.sch.uk

Email: office@easthoathly.e-sussex.sch.uk
office@chiddingly.e-sussex.sch.uk

3.2 Confidential information includes, but is not limited to:

- Person-identifiable information, e.g. service user and employee records protected by the Data Protection Act 1998
- Information divulged in the expectation of confidentiality
- County Council business or corporate records containing organisationally or publicly sensitive information
- Any commercially sensitive information such as information relating to commercial proposals or current negotiations, and
- Politically sensitive information.

3.3 Staff members should also be aware that other laws relating to libel, defamation, harassment and copyright may apply to information posted on social media, including:

- Libel Act 1843
- Defamation Acts 1952 and 1996
- Protection from Harassment Act 1997
- Criminal Justice and Public Order Act 1994
- Malicious Communications Act 1998
- Communications Act 2003, and
- Copyright, Designs and Patents Act 1988.

3.4 The County Council could be held vicariously responsible for acts of their employees in the course of their employment. For example, staff members who harass co-workers online or who engage in cyberbullying or discrimination on the grounds of race, sex, disability, etc or who defame a third party while at work may render the County Council liable to the injured party.

4 RELATED POLICIES

4.1 This policy should be read in conjunction with the following departmental and County Council corporate policies:

- ASC/CS Confidentiality Codes of Practice
- ASC/CS Information Governance Policy
- Code of Conduct for Employees
- Internet Access and Usage Policy
- Email Use Policy
- Personal Use of Council Equipment Policy

5 PRINCIPLES – BE PROFESSIONAL, RESPONSIBLE AND RESPECTFUL

5.1 You must be conscious at all times of the need to keep your personal and professional lives separate. You should not put yourself in a position where there is a conflict between your work for the County Council and your personal interests.

Headteacher: Mr James Procter

Email: jprocter@easthoathly.e-sussex.sch.uk
head@chiddingly.e-sussex.sch.uk

Email: office@easthoathly.e-sussex.sch.uk
office@chiddingly.e-sussex.sch.uk

5.2 You must not engage in activities involving social media which might bring the County Council into disrepute.

5.3 You must not represent your personal views as those of the County Council on any social medium.

5.4 You must not discuss personal information about service users, County Council staff and other professionals you interact with as part of your job on social media.

5.5 You must not use social media and the internet in any way to attack abuse or defame service users, colleagues, other professionals, other organisations or the County Council.

5.6 You must be accurate, fair and transparent when creating or altering online sources of information on behalf of the County Council.

6 PERSONAL USE OF SOCIAL MEDIA

6.1 Staff members should not identify themselves as employees of the County Council or service providers for the County Council in their personal webspace. This is to prevent information on these sites from being linked with the County Council and to safeguard the privacy of staff members, particularly those involved in providing sensitive frontline services.

6.2 Staff members must not have contact with service users whose cases they or their teams deal with through any personal social medium.

6.3 The County Council does not expect staff members to discontinue contact with their friends or family via personal social media once they start using County Council services. However, any information staff members obtain in the course of their employment must not be used for personal gain nor be passed on to others who may use it in such a way.

6.4 Information staff members have access to as part of their employment, including personal information about service users, County Council staff and other parties and team, service or corporate information must not be discussed on their personal webspace.

6.5 Photographs, videos or any other types of image of service users or images depicting staff members wearing County Council uniforms or clothing with the County Council logo or images identifying sensitive County Council premises and uniforms (eg care homes, secure units, schools) must not be published on personal webspace.

6.6 County Council email addresses and other contact details must not be used for setting up personal social media accounts or to communicate through such media.

Policy: Social Media policy

Date: July 2015

Reviewed: November 2017, annually

Co-ordinator: Head

Headteacher: Mr James Procter

Email: jprocter@easthoathly.e-sussex.sch.uk
head@chiddingly.e-sussex.sch.uk

Email: office@easthoathly.e-sussex.sch.uk
office@chiddingly.e-sussex.sch.uk

6.7 Staff members must not edit open access online encyclopaedias such as *Wikipedia* in a personal capacity at work. This is because the source of the correction will be recorded as a County Council IP address and the intervention will, therefore, appear as if it comes from the County Council itself.

6.8 County Council corporate, service or team logos, brands or school badges must not be used or published on personal webspace.

6.9 The County Council only permits limited personal use of social media while at work. Access to social media sites for personal reasons is not allowed between 9am and 3.25pm (unless used in break-times or lunch-times).

General guidance

6.10.1 Caution is advised when inviting work colleagues to be 'friends' in personal social networking sites. Social networking sites blur the line between work and personal lives and it may be difficult to maintain professional relationships or it might be just too embarrassing if too much personal information is known in the work place.

6.10.2 Staff are strongly advised to ensure that they set the privacy levels of their personal sites as strictly as they can and to opt out of public listings on social networking sites to protect their own privacy. Staff should keep their passwords confidential, change them often and be careful about what is posted online; it is not safe to reveal home addresses, telephone numbers and other personal information. It is a good idea to use a separate email address just for social networking so that any other contact details are not given away. Staff working in schools or other contexts involving young people must not allow pupils to be friends in personal social networking sites

7 USING SOCIAL MEDIA ON BEHALF OF THE COUNTY COUNCIL

7.1 General guidance

7.1.1 Staff members participating in social media for work purposes are expected to demonstrate the same high standards of behaviour as when using other media or giving public presentations on behalf of the County Council.

7.1.2 Prior to creating a site, careful consideration must be given to the purposes for using social media and whether the overall investment is likely to be worthwhile for achieving effective delivery of services. Consideration should also be given to existing websites that the department is maintaining and whether these websites can be used instead of social media to achieve the proposed aims.

7.1.3 The proposed audience and level of interactive engagement with the site, for example whether service users or members of the public will be able to contribute content to the site, must be discussed with the line manager and approved by the relevant Assistant Director.

7.1.4 Staff members must consider how much time and effort they are willing to commit to a proposed site. They should be aware that maintaining a site is not a one-off task, but involves a considerable time commitment.

Policy: Social Media policy

Date: July 2015

Reviewed: November 2017, annually

Co-ordinator: Head

Headteacher: Mr James Procter

Email: jprocter@easthoathly.e-sussex.sch.uk
head@chiddingly.e-sussex.sch.uk

Email: office@easthoathly.e-sussex.sch.uk
office@chiddingly.e-sussex.sch.uk

7.1.5 Managers must take overall responsibility to ensure that enough resources are provided to keep the site refreshed and relevant. It is important that enough staff members are trained and are able to maintain and moderate a site in case of staff absences or turnover.

7.1.6 There must be a careful exit strategy and a clear plan from the outset about how long the site will last. It must not be neglected, creating a potential risk to the County Council brand and image.

7.1.7 Consideration must also be given to how the success of the site will be evaluated to assess whether the site has achieved the proposed objectives.

7.2 Approval for creation of or participation in webspace

7.2.1 County Council social media sites can be created only by or on behalf of County Council teams. Site administrators and moderators must be County Council employees.

7.2.2 Approval for creation of sites for work purposes, whether hosted by the County Council or hosted by a third party such as a social networking site, must be obtained from the relevant Assistant Director

7.2.3 Approval for participating, on behalf of the County Council, on sites created by third parties must be obtained from the Head of Service.

7.2.4 Content contributed to own or third-party hosted sites must be discussed with the line manager and approved of by the department's E-business manager.

7.2.5 The department's Communications Team must be consulted about the purpose of the proposed site and its content. In addition, the Communication Team's approval must be obtained for the use of the corporate (and service) logo and brand.

7.2.6 Staff must complete the Approval Form (see appendix) and forward it to the departmental E-business manager before site creation.

7.2.7 Be aware that the content or site may attract media attention. All media enquiries must be forwarded to the departmental Communications Team immediately. Staff members must not communicate with the media without the advice or approval of the Communications Team.

7.3 Content of webspace

7.3.1 County-Council-hosted sites must have clearly expressed and publicised Terms of Use and House Rules. Third-party hosted sites used for work purposes must have Terms of Use and House Rules that conform to County Council standards of professional conduct and service.

7.3.2 Staff members must not disclose information, make commitments or engage in activities on behalf of the County Council without authorisation.

7.3.3 Information provided must be worthwhile and accurate; remember what is published on the site will reflect on the County Council's image and services.

7.3.4 Stay within the law and be aware that privacy, data protection, libel, defamation, harassment and copyright law may apply to the content of social media.

Policy: Social Media policy

Date: July 2015

Reviewed: November 2017, annually

Co-ordinator: Head

Headteacher: Mr James Procter

Email: jprocter@easthoathly.e-sussex.sch.uk
head@chiddingly.e-sussex.sch.uk

Email: office@easthoathly.e-sussex.sch.uk
office@chiddingly.e-sussex.sch.uk

7.3.5 Staff members must respect their audience and be sensitive in the tone of language used and when discussing topics that others may find controversial or objectionable.

7.3.6 Permission must be sought from the relevant people before citing or referencing their work or referencing service providers, partners or other agencies.

7.3.7 County-Council-hosted sites must always include the corporate logo or brand to ensure transparency and confidence in the site. The logo should, where possible, link back to the relevant page on the County Council website.

7.3.8 Staff members participating in County-Council-hosted or other approved sites must identify who they are. They must disclose their positions within the directorate, service or County Council on these sites.

7.3.9 Staff members must never give out their personal information such as home contact details or home email addresses on these sites.

7.3.10 When expressing personal opinions, staff members must use a disclaimer such as ‘the views expressed here are my own and do not necessarily represent the views of the County Council’.

7.4 Contributors and moderation of content

7.4.1 Careful consideration must be given to the level of engagement of contributors – for example whether users will be able to add their own text or comments or upload images.

7.4.2 Sites created for and contributed to by service users must have strong privacy settings to prevent breaches of confidentiality. Service users must not be able to be identified.

7.4.3 The content and postings in Council-hosted sites must be moderated. Moderation is the responsibility of the team that sets up or initiates the site.

7.4.4 The team must designate at least two approved Administrators whose role it is to review and moderate the content, including not posting or removal of comments which breach the Terms of Use and House Rules. It is important that there are enough approved moderators to provide cover during leave and absences so that the site continues to be moderated.

7.4.5 For third-party-hosted sites such as social networking sites used for work purposes, the responsibility for protection and intervention lies first with the host site itself. However, different sites may have different models of intervention and it is ultimately the responsibility of the staff member creating the site to plan for and implement additional intervention, for example in the case of comments likely to cause extreme offence.

Headteacher: Mr James Procter

Email: jprocter@easthoathly.e-sussex.sch.uk
head@chiddingly.e-sussex.sch.uk

Email: office@easthoathly.e-sussex.sch.uk
office@chiddingly.e-sussex.sch.uk

- 7.4.6 Behaviour likely to cause extreme offence, for example racist or homophobic insults, or likely to put a young person or adult at risk of harm must never be tolerated. Such comments must never be posted or removed immediately and appropriate authorities, for example the Police or Child Exploitation and Online Protection Centre (CEOP), informed in the case of illegal content or behaviour.
- 7.4.7 Individuals wishing to be 'friends' on a site must be checked carefully before they are approved. Their comments must be reviewed regularly and any that do not comply with the House Rules must not be posted or removed.
- 7.4.8 Any proposal to use social media to advertise for contributors to sites must be approved by the relevant Assistant Director.
- 7.4.9 Approval must also be obtained from the Assistant Director to make an external organisation a 'friend' of the site.

7.5 Children and young people

- 7.5.1 When creating sites for children and young people, staff members must be alert to the risks to which young people can be exposed. Young people's technical knowledge may far exceed their social skills and awareness – they may post sensitive personal information about themselves, treat online 'friends' as real friends, be targets for 'grooming' or become victims of cyberbullying.
- 7.5.2 Staff members must ensure that the sites they create or contribute to for work purposes conform to the *Good Practice Guidance for the Providers of Social Networking and Other User Interactive Services* (Home Office Task Force on Child Protection on the Internet, 2008)
- 7.5.3 Staff members must also ensure that the webspace they create on third party sites comply with the site owner's minimum age requirements (this is often set at 13 years).
- 7.5.4 Care must be taken to ensure that content is suitable for the target age group and contributors or 'friends' to the site are vetted.
- 7.5.5 Careful thought must be given to the profile of young people when considering creating sites for them. For example, the internet may not be the best medium to communicate with young people (or indeed any age group) receiving confidential and sensitive services from the County Council. It may not be possible to maintain confidentiality, particularly on third-party-hosted sites such as social networking sites, where privacy settings may not be strong enough to prevent breaches of confidentiality, however inadvertent.

Headteacher: Mr James Procter

Email: jprocter@easthoathly.e-sussex.sch.uk
head@chiddingly.e-sussex.sch.uk

Email: office@easthoathly.e-sussex.sch.uk
office@chiddingly.e-sussex.sch.uk

8 MONITORING OF INTERNET USE

8.1 In order to ensure compliance with the Internet Access and Usage Policy and the Use Policy, the County Council monitors usage of its internet and email services without prior notification or authorisation from users. Email

8.2 Users of County Council email and internet services should have no expectation of privacy in anything they create, store, send or receive using the Council's ICT system.

9 BREACHES OF THE POLICY

9.1 Any breach of this policy may lead to disciplinary action being taken against the staff member/s involved. See the [Disciplinary Policy and Procedure](#).

9.2 A breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of the County Council or any illegal acts or acts that render the County Council liable to third parties may result in disciplinary action or dismissal.

9.4 Contracted providers of County Council services must inform the relevant County Council officer immediately of any breaches of this policy so that appropriate action can be taken to protect confidential information and limit the damage to the reputation of the County Council. Any action against breaches should be according to contractors' internal disciplinary procedures.

Appendix

Social Media Site Creation Approval Form



Use of social media on behalf of the County Council must be approved prior to setting up sites.

Please complete this form and forward it to the departmental E-business Manager.

TEAM DETAILS			
Department			
Service			
Team			
Name of author of site		Network username	
Author's line manager		Network username	
PURPOSE OF SETTING UP SOCIAL MEDIA SITE (please describe why you want to set			

Policy: Social Media policy
Date: July 2015
Reviewed: November 2017, annually
Co-ordinator: Head

Headteacher: Mr James Procter

Email: jprocter@easthoathly.e-sussex.sch.uk
head@chiddingly.e-sussex.sch.uk

Email: office@easthoathly.e-sussex.sch.uk
office@chiddingly.e-sussex.sch.uk

up this site and the content of the site)			
What are the aims you propose to achieve by setting up this site?			
What is the proposed content of the site?			
PROPOSED AUDIENCE OF THE SITE Please tick all that apply.			
<input type="checkbox"/> County Council staff <input type="checkbox"/> Adult service users (19 years or older) <input type="checkbox"/> Adult service users with learning disabilities (19 years or older) <input type="checkbox"/> Young service users; please provide age range <input type="checkbox"/> External organisations <input type="checkbox"/> Members of the public <input type="checkbox"/> Others; please provide details			
PROPOSED CONTRIBUTORS TO THE SITE Please tick all that apply.			
<input type="checkbox"/> County Council staff <input type="checkbox"/> Adult service users (19 years or older) <input type="checkbox"/> Adult service users with learning disabilities (19 years or older) <input type="checkbox"/> Young service users; please provide age range <input type="checkbox"/> External organisations <input type="checkbox"/> Members of the public <input type="checkbox"/> Others; please provide details			
ADMINISTRATION OF THE SITE			
Names of ESCC administrators (the site must have at least 2 approved administrators)		Network usernames	
Names of ESCC moderators (the site must have at least 2 approved moderators)		Network usernames	

Policy: Social Media policy
Date: July 2015
Reviewed: November 2017, annually
Co-ordinator: Head

Headteacher: Mr James Procter

Email: jprocter@easthoathly.e-sussex.sch.uk
head@chiddingly.e-sussex.sch.uk

Email: office@easthoathly.e-sussex.sch.uk
office@chiddingly.e-sussex.sch.uk

Who will vet external contributors?		Network usernames	
Who will host the site?	<input type="checkbox"/> ESCC <input type="checkbox"/> Third party; please give host name		
Proposed date of going live			
Proposed date for site closure			
How do you propose to advertise for external contributors?			
If contributors include children or adults with learning disabilities how do you propose to inform and obtain consent of parents or responsible adults?			
What security measures will you take to prevent unwanted or unsuitable individuals from contributing or becoming 'friends' of the site?			
APPROVAL (approval from relevant people must be obtained before the site can be created. The relevant managers must read this form and complete the information below before final approval can be given by the Assistant Director).			
<u>Line Manager</u> I approve the aims and content of the proposed site	Name		
	Signature		
	Date		
<u>E-Business Manager</u> I approve the aims and content of the proposed site	Name		
	Signature		
	Date		
<u>Communications Manager</u> I approve the use of the ESCC brand and logo	Name		
	Signature		
	Date		
<u>Assistant Director</u>	Name		
	Signature		
	Date		

Headteacher: Mr James Procter

**Email: jprocter@easthoathly.e-sussex.sch.uk
head@chiddingly.e-sussex.sch.uk**

**Email: office@easthoathly.e-sussex.sch.uk
office@chiddingly.e-sussex.sch.uk**

Once completed and approved, please forward this application form and email approvals to your E-business Manager.