

Social Media Policy

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Statement of Intent

1. This Social Media policy has been developed as part of the City of London Corporation's commitment to provide employment policies that are relevant for a modern workforce.
2. The move for organisations to use social media as platform to connect with their stakeholders is prevalent. In this respect, the City Corporation is no different and already operates corporate social media accounts to engage and interact with specific audiences.
3. While recognising the benefits and new opportunities these communication platforms bring, given the reach and relative permanence of social media, this policy sets out the principles that City Corporation employees, contractors, agency and casual staff and volunteers are expected to follow when using any social media platform.
4. The City Corporation recognises an individual's right to freedom of expression, and while there is no specific regulation of social media, existing criminal law, and defamation, employment and data protection laws apply.
5. The Director of Human Resources will be responsible for the interpretation, advice and management of the policy and procedure on behalf of the City of London Corporation.

Scope

6. This policy applies to all employees, contractors, volunteers, agency and casual workers at the City Corporation, including teaching staff in the three City Schools and support staff in City of London Police. Reference to employee in this policy refers to all those in scope as described above.
7. This policy may be supplemented by local social media policies for example within Schools and the Barbican Centre where local policies already act as an extension to this policy.
8. This policy applies to the use of social media in both professional (i.e. in the course of your duties and on behalf of the City Corporation) and personal capacities (i.e. your own personal accounts) regardless of whether that use takes place on City Corporation premises, while travelling for business, while working from home, including use outside of normal working hours. It also includes where employees use their own personal electronic devices to use social media, and where the employee or the City Corporation and/or its **partner organisation(s)** may be identifiable.

Purpose

9. The purpose of the policy is to:
- provide employees with a framework that outlines appropriate use of social media
 - protect employees and preserve the City Corporation and partner organisations reputation
 - protect the City Corporation against liability for the actions of its employees

Guiding Principles

10. **The City of London is a political body led by elected Members. Employees are public servants and should therefore act accordingly.** Consistent with the City Corporation's values of Lead, Empower, Trust; the following Guiding Principles should be adhered to when using any form of social media.
- Do not mix the professional and personal in ways likely to bring the City Corporation into disrepute.
 - Do not act in a way that may diminish or undermine your own or your colleagues' reputation and/or effectiveness at work.
 - Do not imply City Corporation endorsement of your personal views when using social media.
 - Do not disclose or misuse confidential information obtained through work.
 - **Conduct online should be consistent with the City Corporation's Code of Conduct.**

Professional Use

11. Whilst employees are encouraged to explore social media for work purposes, only authorised officers of the City Corporation may broadcast from official accounts. Partner organisations are not allowed this access unless expressly provided by the Digital Communications Manager.
12. The City Corporation actively encourages the creation of social media accounts for appropriate business use. Permission from the departmental Chief Officer and Digital Communications Manager must be sought and approved beforehand and while experimentation is encouraged and rarely refused, the Chief Officer's decision will be final. Refer to the [BARCelona guidelines](#) for guidance on appropriate use for any professional account.

13. Employees using social media accounts for work purposes should be mindful to always act like a public servant and in the best interests of the community we serve.
14. City Corporation social media accounts must not be used to share or spread inappropriate content, or take part in any activities that could bring the City Corporation into disrepute. When sharing content, employees should always thoroughly review any content to ensure its suitability and appropriateness before sharing with their network.
15. Social media usage must adhere to all internal and local style protocols. For further information see the [BARCelona Guidelines](#).
16. Respect copyright and credit where required. Employees must have copyright permission before using any text, images or video created by another party and need to be credited. Where possible include a link to the source, but for further specific advice refer to the BARCelona Guidelines.
17. If using a photograph that you have taken yourself, ensure that you obtain permission from any recognisable people in it before publishing. Also, photos of children cannot be used unless specific permission has been granted by parents / guardians or teachers.
18. During a 'crisis' or emergency, all Corporate social media will stop and local feeds should just follow @cityoflondon until given clearance to start up again. Employees may retweet the main City of London feed, Police, TfL and other official sources.
19. Officers must refer all requests for Contractor references to City Procurement who will issue a response after consultation with the appropriate Contract Manager. Officers must also refer all requests for the promotion and marketing of City Contractors to City Procurement who will decide whether the request should be approved.

Personal Use

20. Personal social media use should take place during designated breaks and before or after work.
21. **Employees' off-duty hours are their personal concern** but even when used in a purely personal capacity, employees should be mindful that they may still be perceived as a representative of the organisation by their network and by others who may be able to see what they write, whether or not they identify themselves as someone who works for the City Corporation. Behaviour should therefore be in line with the Guiding Principles and City Corporation's general Code of Conduct.
22. Personal accounts must not include City of London Corporation or any variation thereof in the name or username fields of the profile, regardless of **privacy settings**.

23. Personal accounts must also not intentionally use the City's crest, or coat of arms, or any trademarked logos such as the Barbican Centre or City of London Police logos. This is acceptable where this might be automatically populated by the social network; Facebook or LinkedIn for example.
24. Employees should be mindful that anything posted on the Internet is within the public domain, which may be accessible to customers and colleagues. Whilst recognising everyone's right to freedom of expression, employees should always assume that all of their social media communication is visible to anyone, anywhere, at any time and act accordingly, regardless of privacy settings. Please also note that anything which could be interpreted as business conducted on behalf of the City Corporation could fall within scope of the Freedom of Information Act 2000.
25. Where employees have taken steps to conceal their identity and employer – either in part or more fully – employees should be mindful that it is unlikely this would remain hidden in all circumstances.

Inappropriate Use

26. This section outlines how breaches of the “Guiding Principles” will be addressed.
27. In accordance with the Code of Conduct, employees are expected to conduct themselves in a way that, in the reasonably held belief of the City Corporation, is not likely to fundamentally undermine the required relationship of trust and confidence between themselves and the organisation.
28. Employees are individually responsible for any content they publish on social media sites, including anything shared (or retweeted).
29. Employees should be aware that deliberate or even inadvertent misuse of social media (in either a professional or personal capacity) in breach of the ‘Guiding Principles’ or Code of Conduct may lead to disciplinary action under the City Corporation’s [Disciplinary Procedure](#).
30. Serious breaches of the ‘Guiding Principles’, for example incidents of bullying individuals / colleagues or social media activity causing (or with the potential to cause) serious damage to the City Corporation, may constitute gross misconduct and may lead to action under the disciplinary procedure up to and including dismissal.

31. Examples of inappropriate conduct that may constitute a disciplinary offence.

Any communications that employees make in a professional or personal capacity through social media that:

Bring the organisation into disrepute, for example by:

- criticising or arguing with customers or colleagues;
- making defamatory comments about colleagues and/or individuals, customers, partner organisations or other associated groups; or
- making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age;
- posting images that are inappropriate or links to inappropriate content;

Breach confidentiality, for example by:

- revealing confidential information owned by or in relation to the City Corporation;
- giving away confidential information – such as personal information or information about associated organisations (such as another Local Authority or local business); or
- discussing the City Corporation’s internal workings (such as its future business plans, proceedings of committee meetings that have not been expressly authorised for sharing or already communicated to the public);
- failing to comply with section 14 of the Employee Data Protection Policy.

Do anything that could be considered discriminatory against, or bullying or harassment of, another colleague, 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, harass, threaten or victimise a colleague
- posting images that are discriminatory or offensive (or links to such content).

32. Employee’s personal social media profiles will not be routinely monitored. However, the City Corporation may monitor employee’s internal and external communications at work in line with the [Employee Data Protection Policy](#). The City Corporation considers that valid reasons for checking an employee's internet usage include suspicions that the employee has:

- been spending an excessive amount of time using social media websites for non-work-related activity; or
- acted in a way that is in breach of the ‘Guiding Principles’ set out in this policy.

33. Employees who work with pupils or other vulnerable persons are responsible for their own actions and behaviour and should avoid any conduct which may lead any reasonable person to question their motivation and intentions. Appropriate professional boundaries must be maintained at all times, and under no circumstances should employees who work with vulnerable persons “friend” or “follow” that person online. If you have any concerns around an individual’s behaviour you can contact

either the Designated Safeguarding Lead (DSL) in the first instance, or the Local Authority's Designated Officer (LADO) within Department of Community & Children's Services.

34. Access to social media websites from premises, computer equipment or electronic devices belonging to the City Corporation may be withdrawn in the case of misuse.

Monitoring

35. Internet usage will be monitored corporately in accordance with the [Communications & Information Systems Use Policy](#).
36. Employees who see social media content that disparages or reflects poorly on the City Corporation should inform their line manager and the Digital Communications Manager as soon as possible.

Social media in the recruitment process

37. Recruiting managers should not screen prospective employees via social media channels, unless there is a justifiable reason in connection with a requirement of the role (for example, marketing or communications jobs where communication via social media is fundamental to the role) and/or where the candidate has expressly provided the content they wish to be viewed.
38. Employees involved in the recruitment process, or recruitment agencies acting on behalf of the City Corporation should be mindful of the City Corporations commitment to promoting Equal Opportunities and the Equality Act 2010. Employees or partner organisations involved in recruitment should therefore pay particular attention to avoid the presumption that an applicant's protected characteristics (for example, sexual orientation and/or religious beliefs) played a part in any recruitment decision, and ensure the principles of the Recruitment and Selection Policy are followed.

Definitions

39. **Social media** is the collective of online communications channels or social networks dedicated to community-based input, interaction, content-sharing and collaboration. Websites and applications dedicated to forums, micro-blogging, social networking , social bookmarking and wikis are among the different types of social media. This includes but is not limited to online social forums such as Twitter, Facebook and LinkedIn, YouTube and Flickr. Employees should be aware that this list is not exhaustive and there are many more examples, but should follow the guidelines in relation to any social media that they use.
40. **Privacy settings** refer to the controls available on social networking websites that allow users to limit other users access to their profile or information contained within.
41. **Partner** organisations refers to any contractors, agency staff or organisations working on behalf of the City Corporation.

Links / Other resources

- [Social Media FAQ's](#)
- [Code of Conduct](#)
- [Disciplinary Procedure](#)
- [Recruitment and Selection Policy](#)
- [Employee Data Protection Policy](#)
- [BARCelona Guidelines](#)
- [Communications & Information Systems Use Policy](#)