

# The Highland Council

## Social Media Policy

### 1. Introduction

1.1 Social Media includes the various online technology tools that enable people to communicate easily, share information and resources. Social media includes, but is not limited to, blogs and vlogs, RSS feeds and numerous social networking sites, photo sharing and video sharing sites, such as Facebook, Twitter, LinkedIn, Instagram, TikTok, Whatsapp, Flickr and YouTube. Social media also includes digital consultation tools.

1.2 The use of social media is one of the essential tools for dialogue between the Council, their partners and the public. It is used to:

- Provide and signpost information.
- Disseminate messages and help to increase understanding of the vision, aims and decisions of the Council.
- To promote the Highlands as a region to live, work, visit and do business.
- Manage and enhance the reputation of the Council, by demonstrating openness and building trust, particularly in the democratic process
- Warn and inform the public and provide reassurance during emergency situations.
- Engage, gather information and consult on key issues to inform the decision-making process.
- To advertise recruitment opportunities.
- To advertise real estate.
- To reach and engage with groups of staff.
- To counter false or inaccurate information circulating on social media about issues which affect the Council's reputation and people's confidence.
- Target specific audiences with specific information.
- Evaluate, learn and adapt the Council's approach to communication and engagement. □ As an effective training resource and professional networking tool.

1.3 The Council uses the most popular social media channels in a strategic way by targeting limited resources at the most effective channels to reach the right audiences. These channels are Twitter, Facebook, You Tube, Flickr, Instagram, Whatsapp and TikTok.

1.4 The purpose of this policy is to:

- Set out our strategy for the corporate use of social media.
- Provide clear guidelines to elected members and employees on the use of social media;
- Set out our policy for using social media and guidance for the public who engage with us on social media;
- Set standards of good practice in the use of social media;
- Ensure employees and members are aware of their responsibility to comply with all legislation including discrimination, data protection, defamation and copyright; and
- Assist employees and members to distinguish between the use of social media in their work and personal lives.
- Promote the need to be fair and accountable and make employees aware of the importance of reporting online hate and discrimination.

The behaviours expected for communicating and engaging in a digital world are not any different from those expected of people in other methods of communication, such as face-to-face, via the telephone and by email.

## 2. Background

- 2.1 Social media is one of the most important, world-wide communication channels. While social media opens new opportunities for communication, engagement and collaboration, it also creates new responsibilities and risks for individuals.

Posted material and comments can reflect not only on the reputation of an individual, but also on that individual's employer, clients, colleagues and profession.

- 2.2 In addition to the most popular social media channels, the Council also uses a range of other digital tools to engage and consult with the public.

## 3. Social media channels used by the council include:

### 3.1 Twitter:

The Council has a corporate Twitter account with an extensive reach (over 30,000 followers).

Twitter is used to signpost links to news releases and other information on our website; publish pictures and video content; warn and inform during emergencies or severe weather; and to publicise live information about events. It is also used to engage with the public and partners and share relevant partner information.

The Highland Council Twitter feed is also published live on our website home page.

Live updates on our school closures are pushed to our Twitter feed.

The feed is used and monitored during office working hours. Some tweets may be programmed in advance using Hootsuite.

The Council will not respond to all comments, but will endeavor to answer questions and direct messages within the limited resource for monitoring activity. Requests for service or complaints will be referred to the reporting section on The Council website [www.highland.gov.uk/report](http://www.highland.gov.uk/report) or the how to contact us page at [www.highland.gov.uk/contactus](http://www.highland.gov.uk/contactus)

Appropriate action will be taken to address factually inaccurate statements, where it is reasonable and practicable to do so.

Our social media policy is linked from our Twitter feed and this details how we will respond to questions and complaints.

The Council has several other dedicated Twitter feeds including the following:

- @HighlandCouncil administered by the Corporate Communications Team
- @highlanddevplan administered by the Infrastructure and Environment Service
- @highlandhroads administered by Principal Traffic Officer □  
@Corranferry administered by the Corran Ferry staff

Schools across the region have and operate their own social media feeds in order to communicate with parents and the local community.

A number of ward managers and directors also have official council twitter feeds for engaging with their communities and stakeholders.

In a major emergency, staff can be contacted through our emergency plans and can update social media remotely, if urgent communication is required. The Police have statutory responsibility for warning and informing the public in relation to major emergencies, such as evacuations or road closures.

The staff operating the Corran Ferry are trained to use the @corranferry twitter feed to communicate service interruption.

NHS Highland have responsibility as the lead agency for adult social care for communicating information in relation to care for people in emergencies.

### 3.2 Facebook:

The Council has a corporate [Facebook](#) page with an extensive reach (over 32,000 followers) and a number of other service specific pages. Facebook is used to post links to news releases, photographs and video content, advertise service changes and promote events, as well as warn and inform in the run up to and during a response to emergencies.

Relevant partners' posts can be shared, for example Ready Scotland campaigns; Scottish Government and Public Health information, Met Office severe weather warnings, SFRS wild fire alerts etc.

Promoted posts are used for targeting specific audiences with specific information, for example, recruitment adverts, promoting grants, advertising property for disposal, etc.

Analysis is available on Facebook "Insights" to enable evaluation of both promoted and un-promoted reach and levels of engagement.

Facebook chats are another way the Council has used to engage with the public in direct live dialogue on key topics. These are held as "events". This has been largely replaced with the ability to use Microsoft Teams to engage with community groups online.

Direct messages are permitted and these receive an automated response which directs customers to the Council website or service centre so that their enquiry, complaint or report can be logged and responded to by the relevant service and within corporate standards.

Followers cannot post directly to our page, however comments are permitted under posts. These are not moderated, however, a range of measures are available to delete, report or block inappropriate comments in line with our public policy.

Our social media is used and monitored during office working hours. Some posts may be programmed in advance. The Council will not respond to all comments, but will endeavor to answer questions or clarify policy or rebut incorrect information or rumours, within a limited resource. Requests for service or complaints using post comments, which are picked up through monitoring, will be referred to the reporting section on our website [www.highland.gov.uk/report](http://www.highland.gov.uk/report) or the how to contact us page at [www.highland.gov.uk/contactus](http://www.highland.gov.uk/contactus).

During a major emergency, staff can be contacted through our emergency plans and can update social media remotely, if urgently required.

The Council's social media policy is linked from our page and this details how we will respond to questions and complaints.

Other Council Facebook pages include:

The Planning and Development Service manage a Facebook presence via:

- [Highland Historic Environment Record](#)
- [Highland Local Development Plans](#)
- [The Wild Coastal Trail](#)
- [Highland Council Trading Standards](#)
- Highland Council Staff Page (Closed Staff group)

### 3.3 YouTube:

The Council uses "YouTube" to post or share video content and this can be disseminated by linking the content to news releases, or posts on our social media channels. It is also used as a resource home for online Area Committee meetings and training videos (these are hidden from public view).

### 3.4 Use of Flickr:

The Council publish photographs (including members' approved photos) on Flickr, which are of a quality that the media can use in their publications.

The [Highland Historic Environment Record](#) also has a Flickr group.

### 3.5 Blogging:

Blogging or podcasts can be used to promote key changes and consultations, such as Budget Consultations. These may be web pages on our website rather than blogging sites. Comments can be permitted and if so, are moderated and responded to in line with the Council's Social Media Policy.

### 3.6 Instagram:

Instagram is a photo and video- focused channel of communication.

Instagram now has the facility to upload videos which are longer than 1 minute, using IGTV, an option built into the app

### 3.7 TikTok:

TikTok is another social network, primarily used by younger people, particularly those in their teens, 20s or 30s, but not exclusively.

TikTok is a short-form, video-sharing app that allows users to create and share 15-second videos, on any topic. The TikTok app offers users a wide selection of sounds and song snippets, along with the option to add special effects and filters. There is also an option to directly add videos created on your phone.

The app allowed users a plethora of music and dialogue options, with which they can lip sync and make funny or entertaining videos.

Highland Council first started using TikTok as a way to engage with young people, particularly in relation to the Scottish Parliamentary Elections. It was a tool used to encourage 16 and 17-year-olds to go out and vote.

It has since been used to issue information which is aimed at young people in particular.

### 3.8 Staff Access to social media channels

Facebook, Twitter, YouTube and LinkedIn are accessible to all staff for business and professional use only.

Staff who wish to use social media to engage with the public, customers or clients to carry out council business, must seek advice, permission, and if necessary, training, from Corporate Communications. A social media application request form must be completed.

## 4. Policy and Guidance (for the Public)

### 4.1 The following statement is published on our Council social media to set out our policy on acceptable use of these platforms by the public.

“The Highland Council uses social media to keep people informed about the services that we provide; Council decisions and election results; to promote events; and publish links to request or report or pay for services. Together with

our partners, we will also use social media to publish important information to help keep you safe or help you prepare for emergency events.

We also use social media channels to engage and consult on key issues to inform the decision-making process. We may also ask for your views and feedback on certain topics such as budget consultations using specific digital engagement tools.

Our social media sites are administered by Council staff and are generally monitored during normal office hours. They are not monitored 24/7.

Please don't use Facebook or Twitter to report a service fault or to make a complaint. For help with services, to report a fault or [make a complaint](#), please visit: [www.highland.gov.uk/contactus](http://www.highland.gov.uk/contactus) or call 01349 886606

If you have concerns about a child, please see [our website](#) for advice.

To make a [Freedom of Information](#) request, please use our [email form](#) or write to: Freedom of Information Officer, Chief Executive's Office, Glenurquhart Road, Inverness, IV3 5NX.

The Highland Council reserves the right to remove any contributions or block accounts to our social media sites that breach the following guidelines:

- Be civil, tasteful and relevant.
- Do not post messages that are unlawful in any way: prejudicial to court proceedings, abusive, harassing, defamatory, threatening, harmful, defamatory, obscene, profane or racially offensive.
- Do not swear.
- Do not make offensive remarks about someone else.
- Do not post content copied from elsewhere, for which you do not own the copyright.
- Do not post the same message, or very similar messages, more than once (also called "spamming").
- Do not publicise your, or anyone else's, personal information, such as contact details.
- Do not advertise products or services.
- Do not impersonate someone else.

## Guidelines on the acceptable use of social media for employees

### 1. Why do we need Social Media Guidelines?

The purpose of these guidelines is to make clear what our responsibilities are when using social media in a work or professional capacity, but also to highlight when these responsibilities cross into our personal use of social media.

### 2. Access to Social Media

The Council will:

- Make appropriate social media access available to employees as appropriate to their work needs and capacity;
- Set clear standards of behaviour by employees using social media through appropriate policies; and
- Ensure information and training is available for any employees using social media for council work or professional use.

### 3. Using Social Media in the Workplace

- 3.1 Employees requesting a formal council presence for business use, to use social media to support their work duties should first discuss their requirements with their line manager, then seek advice, permissions and, if necessary, relevant training from Corporate Communications. Training materials are available on the intranet. (Request forms are available.) The benefits, maintenance and any associated risks will be assessed before permission is granted, to ensure the council uses social media effectively and to avoid the proliferation of social media accounts which cannot be monitored or maintained. The most effective platform is generally to use the main corporate social media accounts, which are regularly maintained and have a significant following to reach a wide audience.
- 3.2 Many employees may wish to use social media for professional use through a more informal channel, for networking and sharing information within their field of work. See paragraph 5.

### 4. Using Social Media for Business Use

- 4.1 Those authorised to use social media in the workplace have a responsibility to use the tools in an appropriate manner.

4.2 Staff should not use social media to conduct Council business unless they have received relevant permissions and appropriate training. Services must apply for a representative/s to be registered on the approved business social media user list held by the Corporate Communications team.

4.3 All online participation must be attributable and identifiable as a legitimate corporate/service spokesperson.

Authorised users must adhere to all relevant legislation, for example, copyright and data protection laws. Breach of legislation or the code of conduct may result in the user being subject to the Council's Disciplinary Procedure.

Permission should be sought to publish photographs or video taken of individuals at Council or private business meetings. (There are rules restricting the use of photography/videography during council meetings.)

Confidentiality is of utmost importance. No one should publish confidential information and take care that photographs do not show confidential information, such as paperwork on a desk.

Users must comply with the Staff (or Member) Code of Conduct .

Council staff must remain politically neutral at all times when using social media on behalf of the council. Do not publish or share political content. No council resources may be used for political purposes.

Council business social media accounts must not be used to post or promote personal opinions or non-council related content.

Be aware that content on social media websites may be subject to Freedom of Information requests.

The Council's reputation is closely linked to the behaviour of its employees, and everything published reflects on how the Council is perceived. Social media should be used in a way that adds value to the Council's business; ie solving problems; enhancing the Council's services, processes and policies; research and learning; creates a sense of community; or helps to promote the Council's aims and values.

Monitoring of the main corporate social media sites will be carried out within available resource by the Corporate Communications staff, within business hours. Staff who are responsible for other Council social media sites are responsible for monitoring these and bringing any issues to the attention of Corporate Communications.

Any incidents of suspected hacking or cyber activity should also be brought to the immediate attention of Digital Services.

## 5. Professional Use of Social Media

- 5.1 Leaders/professionals who are active on social media can play a critical role in broadening and reinforcing the organisation's messages. Use of social media in a "professional" capacity to network and participate in professional forums and dialogue can be very rewarding and useful as a networking tool.

Professional networking is Professional use, as with any use of social media, may be very positive and productive, but also carries an element of risk. Individuals need to understand that identifying themselves in a professional capacity means they may be seen to be representing the council.

LinkedIn is a useful platform for publishing professional content.

Staff should be careful of blurring the lines between personal and business use of social media. Inappropriate personal use of social media could adversely affect the Council's reputation and/or a member of staff's reputation. Comments need to be human and authentic, but not everyone has the same sense of humour, so be aware of the potential to inadvertently cause offence.

Risks and pitfalls to be aware of include the potential to "gazump" corporate news stories and launches or leak embargoed or confidential information; or to inadvertently create a high profile news story due to the public and dynamic nature of using social media as a professional forum.

Employees should note the importance of political impartiality in the Staff Code of Conduct and Election Guidance, when publishing any comments or material on social media on behalf of the Council, or as a Council employee or in a Professional capacity. Retweeting or sharing is effectively publishing material.

## 6. Guidelines for Personal and Professional use of social media

- 6.1 When participating in social networking or while using social media, common sense and good judgment must be used when posting or sharing material. [Top tips](#) for using social media are published on the intranet.
- 6.2 Staff may identify themselves as council staff on their personal accounts, but this carries the risk of being responsible for views expressed being associated with the council and all the associated reputational consequences.
- 6.3 Where material posted either during work or in their own personal time, breaches Council policy, employees may be subject to disciplinary action. Anyone who identifies themselves as

Council Employees on their private social media sites, may be seen as representing the Council and they must then behave accordingly within standards set by the Staff Code of Conduct.

It is important that 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.

6.4 The following guidelines should be helpful in avoiding most issues:

- o Most importantly be clear about your purpose for using social media in a professional capacity in order to get the most out of these channels and to avoid any pitfalls
- o Personal accounts should not be used for conducting official council business.
- o If you wish to use social media for professional networking, you are advised to keep professional and personal accounts separate.
- o When using social media for personal purposes, staff must not imply they are speaking for the Council. The use of the Council e-mail address, Council logos or other Council identification should not be used in personal social media.
- o If you identify yourself as a member of council staff, it should be made clear that what is said is not representative of the views and opinions of the Council and you will need to comply with staff code of conduct.
- o You must comply with other Council policies when using social media. For example, staff should not breach council confidentiality and information security or information management policies. If in doubt, don't post it.
- o You must comply with all legislation and in particular, be aware of copyright, and data protection laws, as well as risks of defamation if you criticize someone through social media
- o Racism, sectarianism or other types of discrimination are unlawful and are not acceptable in any context.
- o Be aware that any comments or images may reflect on the Council or you as an employee in a negative manner;
- o Be mindful of your privacy settings and how to use them.
- o Make sure you are familiar with the functions and setting of the social media channel you are using. Eg; how to delete or report a post; who can see your posts etc
- o You should be aware that by revealing personal details you might be more vulnerable to identity theft or other online crime. You should not post personal details of others. o Do not get involved in arguments with someone online.

## 5. Non-Compliance with Social Media Policy

- 5.1 Expectations of employee's behaviour when interacting with social media are no different from expectations of their behaviour when dealing with other methods of communication, such as face-to face or on the telephone or email. Where an employee's actions on social media is brought to the attention of the Council, dependent on the nature of the complaint, this may require further investigation, and may be subject to the Council's Disciplinary Procedure.
- 5.2 Employees should also be aware that where there is a serious breach of the Council's Social Media Policy of a possible criminal nature, the Council may be obliged to report this to the Police.
- 5.3 Where employees have a complaint or a grievance against either a colleague or the Council, these should be progressed through formal procedures and not aired in public.
- 5.4 The Council has no control over members of the public using social media. If we are made aware of a breach of our public policy on any of our sites, we will remove or report offensive or inappropriate comments and any actions will be taken in accordance with our policy.
- 5.5 Don't post links without checking them out first so you don't share something inappropriate inadvertently.

## Guidance to elected members

### 1. Background

The use of social media can increase the accessibility of elected members and offer effective ways in which to engage with constituents, stakeholders and the wider public. National and [local guidance](#) and training is available to members on the use of social media.

Recent comprehensive national guidance, ["Follow Me"](#) (A Guide to social media for elected members) is published on the Intranet.

The Guidelines for staff use of social media may be useful in keeping safe online, avoid pitfalls and helping you to direct constituent enquiries.

## 2. Access to social media

Access to social media is permitted on council devices. Councillor social media feeds may be used as a communication and engagement tool for Councillors on Council/Ward business. They may not be used by Members for party political or election purposes.

Members are reminded of their responsibility at all times for ensuring they comply with all relevant legislation and guidance when using social media, including the Councillors' Code of Conduct, and the need to be considerate and courteous to fellow councillors and members of staff when using social media.

## 3. Use of social media/electronic devices during Council proceedings

The Council allows the use of hand-held electronic devices in formal council and committee meetings (including accessing social media and the internet), provided that they are silent, and used in a way that does not interrupt proceedings. Using social media during meetings is subject to the following guidance.

- Use of Mobile devices: In line with our “paper-lite” policy, Members should refer to electronic devices in place of paper reports or speaking notes at all meetings.
- Regulatory meetings (planning and licensing) and private discussions/briefings at Council/Committee meetings: In keeping with the spirit of the Councillors' Code of Conduct governing regulatory committee meetings, mobile devices, including mobile phones, should not be used for any form of communication (email, text or tweet) during business. This measure is to avoid any communication from a member of the public with an elected member which could influence the outcome of an application under discussion.
- 7.4 of the Councillors' Code of Conduct governing fairness and impartiality, states: “To reduce the risk of your, or your Council's, decisions being legally challenged, you must not only avoid impropriety, but must at all times avoid any occasion for suspicion and any appearance of improper conduct”.
- This restriction also applies to discussions at full Council or Committee meetings held in private, or confidential briefings.
- Photographs: Without the explicit consent of the Chair, photographs/videos should not be taken (or transmitted) during any Council meeting. Care should also be taken not to include confidential papers in any photographs. High quality pixilation could result in confidential information being exposed.

- Mobile phones: At all times during meetings, mobile phones should remain on silent or be switched off.
- Public/media: The public and media are permitted to use social media (on silent) from the public benches during public meetings – but must not take photographs of proceedings. Permission must be sought of the Chair to record proceedings, if webcast is not being used.

#### 4. Guidelines

The following Guidelines may be useful in keeping safe online, avoid pitfalls and helping you to direct constituent enquiries.

- o Keep personal and councillor or political accounts separate.
- o You must comply with the Code of Conduct for Elected Members
- o You must comply with other Council policies when using social media. For example, information security or information management policies. If in doubt, don't post it.
- o You must comply with all legislation and in particular, be aware of copyright, and data protection laws, as well as risks of defamation if you criticise someone through social media
- o Be aware that any comments or images may reflect on the Council as a whole in a negative manner;
- o Be mindful of your privacy settings and how to use them.
- o Make sure you are familiar with the functions and setting of the social media channel you are using. Eg; how to delete or report a post; who can see your posts etc
- o You should be aware that by revealing personal details you might be more vulnerable to identity theft or other online crime. You should not post personal details of others.
- o Don't post links without checking them out first so you don't share something inappropriate inadvertently.