

Glasgow City Council

Social Media: Our Policy 2022



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Introduction

Our social media policy outlines the processes and procedures for those within the Council family who are approved to communicate on our digital channels on behalf of the Council.

Social media is a key part of our communications and marketing toolkit. With the growth of digital across the city, social media enables us to work more effectively in three ways:

1. Communication

Directly communicate important and timely messages, news and information, promote events and improve awareness of services by providing direct digital access to them.

2. Engagement

Seek opinions, share conversations and correct misconceptions to improve knowledge, increase engagement and make decisions in partnership with communities.

3. Collaboration

Collaboration creates more efficient ways of working together in partnership and sharing information. This can change or enhance the perception of Glasgow City Council and our services.



These aims will be implemented through three strategies:

Marketing and Campaigns

PR and Responsive

Customer Care

Please refer to our [social media strategies](#) for more information on the remits and audiences of each of our accounts, and for guidelines on creating content for our digital channels.

This policy is in line with the [Digital Glasgow Strategy](#) and [Glasgow City Council Strategic Plan 2022-2027](#), in which we aim to:

‘work in partnership allowing people to contribute and for ideas from any source to be heard and considered’ (P.9)

‘Be an open, transparent, and easily accessible organisation which communicates freely with city residents and involves them in decision making’ (P.9)

The fundamentals of this policy should not change, but may undergo review to ensure it is current and evolves with any changes, in line with Council policy and digital landscape.

Purpose and Scope

Social Media: Our Policy, describes how we will use our social media channels for Council purposes, while maximising the benefits of this technology and mitigating risk.

This specifically deals with the use of social media for Council purposes and complements the [existing HR policies](#) and [Acceptable Use of ICT Policy on Connect](#), which sets out the Council's expectations for how employees will conduct themselves when using social media platforms for personal use.

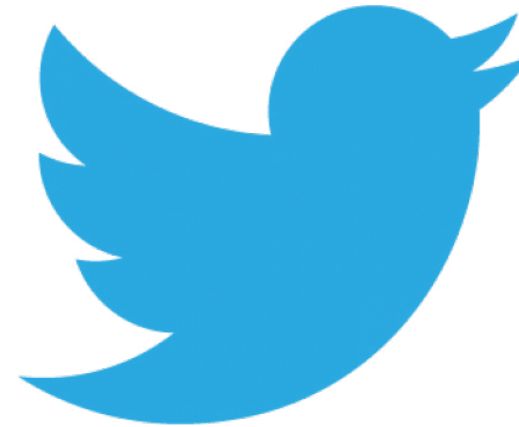
This policy will cover usage, purpose, scope and mitigation of risk, including;

- The objectives for using social media on behalf of the Council
- Potential risks and limitations
- Good management of our social media channels
- Usage by Council employees and services

What is Social Media?

The definition of social media continues to evolve as platforms and technologies develop. It refers to the use of web-based and mobile technologies where users can easily participate in, share and create content.

The most common types of social media include social networking sites such as Facebook, Twitter, Instagram, TikTok, LinkedIn, blogs, forums and content communities such as YouTube and SmartCrowds.



Strategic Aims



Why do we use Social Media?

By using social media effectively, we can achieve the following strategic aims for stakeholder engagement and communication:

1. Make the Council more clear, open and transparent in our communications
2. Manage and create consistent Council communications
3. Create a lean, cost effective and efficient service
4. Improve democratic engagement and increase community engagement
5. Increase the range and number of channels available to communicate and engage better with citizens and beyond
6. Identify and mitigate potential reputational risks
7. Support emergency and crisis communications
8. Meet growing customer expectations with responsive communications
9. Build and maintain good partnership working
10. Create shared goals that link into and compliment non-digital activity across marketing and communications

Principles

In using social media to deliver our strategic aims, we will ensure that:

1. Social media will be used for Council purposes, and where appropriate, training will be provided
2. Communications through social media meet legal requirements
3. All social media channels adhere to our brand and identity guidelines
4. All existing and proposed accounts are controlled and managed
5. Social media is used appropriately, effectively and consistently
6. Social Media: Our Policy complements and supports other related policies and strategies
7. Compliance monitoring is the right of the Council



Mitigation of Risk

Good social media management is fundamental to mitigating risk and managing reputation. The following information outlines how we plan to achieve this.

User Accountability and Feedback

Our users are accountable for the content they post on our social media channels, and all authors of posts can be identified through our social media management software.

Regular review of content will take place and we reserve the right to change or revoke a user's access at any time if they are found to be in breach of our policies.

Account Security

To ensure account security, all authorised accounts must be managed using our current social media management platform, Hootsuite. Hootsuite provides a secure environment for social media engagement, and allows for an audit trail to be established.

Only a limited number of Social Media Management Software licenses are available. These are provided to digital and communication officers, or where there has been a clear business case made for officers operating in other

areas to have access to the software. Additional licenses can be procured at an additional cost if a new account is requested.

Hootsuite offers various levels of access – particularly the editor/reviewer roles which make sure no posts are sent without the appropriate approvals. Access levels will be set by the Digital Comms Review Board.

All social accounts should be managed and monitored centrally by the Digital Communications Team unless otherwise approved by the Digital Comms Review Board. These will be reviewed on a case by case basis.

Content must not be posted directly to the social media platform. All content must be published via our social media management software by authorised users. Further guidance should be sought from the out of hours Press Officer if there is an access issue or emergency situation.

Accounts which are managed outside our social media management software environment do not meet the requirements around security and the potential for hacking, and must be considered at risk from the latter.

Processing Customer Data

We process customer data via social media to allow us to provide services to them as the local authority for the city of Glasgow. You can read more on how we process data at [Glasgow.gov.uk/privacy](https://glasgow.gov.uk/privacy). Please refer to each individual social media platform for their own privacy policies.

For further information on customer care, please refer to our customer care section within our [Social Media Strategies document](#).

Freedom of Information Requests

All users who request Freedom of Information requests through social media should be directed to following the guidance on glasgow.gov.uk/FOI and email their request to foi@glasgow.gov.uk

Image and video consents

All relevant image and filming consents must be sought for any images or audio used on our digital platforms. Please refer to our [Marketing and Campaigns](#) strategy for further information on copyright.

Please find our [privacy statement](#) and [consent form](#) for download. In line with General Data Protection Regulation (GDPR), individuals



Passwords for all social media accounts will be reset frequently by the Digital Communications team for security purposes.

featured reserve the right to withdraw consent at any time. Please store and log any consent forms with the relevant footage or imagery.

Election Period

During any election period, our digital channels will adhere to the guidelines and regulations around partisan communications. During this time, we will not use politicians to promote initiatives, or promote any services that could be deemed in breach, unless there is a requirement in an emergency situation to produce communications

This does not affect or limit our ability to post 'business as usual' posts or campaigns. If you are unsure how this affects your area of service, please speak to the Press Office for further information and guidance.

Moderation and Monitoring

Moderation of Posts and Removal

We are committed to the Equalities (Scotland) Act 2010, and meeting its requirements to eliminate unlawful discrimination, advance equality of opportunity and promote good relations.

We are under no obligation to moderate posts or comments by the public directed towards our accounts. However, we will not be seen to be supporting comments which are:

- defamatory, false or misleading;
- insulting, threatening or abusive;
- obscene or of a sexual nature;
- offensive, racist, sexist, homophobic or discriminatory against any religions or other groups;
- promoting illegal activity; or
- intended to deceive

This is to ensure our platforms are a safe space for all to enjoy. On this basis, and if the platform functionality exists, we reserve the right to hide or remove posts that are irrelevant to the thread of topic, and remove all posts that are deemed offensive.

For more information, please see glasgow.gov.uk/HouseRules

Managing Unacceptable Actions

Please refer to our [Unacceptable Actions Policy](#) regarding guidance on the process for unacceptable actions by customers.

As part of this, we cannot be seen to encourage or enable harmful, trolling or excessive digital contact. This is for protection and wellbeing of both our employees, and users who interact with our digital channels.

If a social media user is deemed to breach our Unacceptable Actions Policy on our digital channels, we reserve the right to mute and/or block the user indefinitely.

Reporting Issues or Concerns

Please report any issues or comments online that you feel may be of concern to Digital Communications team for review.

You can do this by emailing both socialmedia@glasgow.gov.uk. Please refer all press enquiries to the Press Office at PR@glasgow.gov.uk.

If you are concerned for your own welfare, please speak to your line manager. If you are concerned for

another's welfare, please contact Police Scotland on 111 or 999 and report to the relevant platform. Social Work can also be contacted for further advice.

If you wish to make a complaint about an employee's conduct online, please refer to the HR policy. Each report will be addressed on a case-by-case basis, with the relevant action taken. If action is taken on any report, it should be documented, dated and archived.

Auditing of Accounts and Users

All social media accounts and approved social media users will be monitored and audited on a bi-annual basis by the Digital Review Board.

This is to remove inactive users and dormant accounts, while ensuring accounts adhere to the relevant policies, strategies and guidelines.

Social Listening

Social listening is a tool that is used to gather data and mentions of a brand online, to help better understand the wants and needs of the target audience. We may use social listening to build our online audience and help us to understand our citizens better. Social listening is also used to inform our strategies across PR, Marketing, and create better service delivery. All data gathered through social listening is publicly available and adheres to our privacy and GDPR policies.

Monitoring

We may use social media to access information for purposes such as child protection and fraud prevention.

Any service using social media for this purpose must be in line with Regulation of Investigatory Powers (Scotland) Act 2000 and GDPR regulation. Services should have written guidance, process and logs for their use of social media for this purpose in line with their own processes.



Social Media Accounts

The Council has several social media accounts for promoting Council activity and engaging with customers.

We currently have accounts on Facebook, Twitter, Instagram YouTube and LinkedIn. More may be added as new platforms become available and/or demand from communities change.

The Digital Communications Team maintain and record all Glasgow City Council social media accounts which are reviewed by the Digital Comms Review Board. Accounts that are no longer required will be archived, repurposed or deleted.

Please refer to our [Social Media Strategies](#) document to see our approved account list, structure, and remit and responsibilities of each account.



No internal teams, projects or individuals should be permitted to have social media accounts that represent or speak on behalf of Glasgow City Council unless prior approval by the Digital Comms Review Board is obtained.

At no time are handles or usernames containing prefix or suffix GCC, logos or any relation to Glasgow City Council to be used in personal accounts unless authorised by the Digital Comms Review Board.

Employees should not mix personal and work accounts, where possible, and any views posted are those of the account holder, not Glasgow City Council.

Glasgow City Council is not responsible for the content on personal accounts and employees should be mindful of their activity online, adhering to the Council's Employee Code of Conduct.

Requests for new Social Media Accounts

Existing approved accounts should be used for social media posts regarding Council activity, where possible.

- Any requests for new accounts should be submitted to the Digital Comms Review Board. Each request will require a business case which details the purpose and benefits of opening a new account. This includes a content plan for the first year of use and resource plan. [Please submit a request form via Connect.](#)
- New social media profiles can only be approved by the Digital Comms Review Board. Consideration will be given to the particular needs of the requestor as to whether a new social media account is necessary, or whether the information would best be published on existing channels.
- Following the creation of new social media presence, formal three month monitoring should be performed to assess the extent to which expected benefits have been achieved. The Digital Communications Team should manage all new social media accounts unless otherwise agreed.

Endorsement and Connections

Glasgow City Council does not implicitly or explicitly endorse any

individual or organisation merely by virtue of creating a digital connection, regardless of terms used by social media providers such as 'follow', 'like', 'retweet' or 'tag'. We may maintain social media connections with organisations that are contrary to Council policy. We will not hold any responsibility for the content.

We may choose to establish connections organisations and individuals using social media to maintain contact with what other social media users are saying and, where appropriate, share their content.

There is no fixed approach on who we have in our networks, but the connections may include:

- Elected Members and politician commenting on matters of interest to Glasgow
- Public, Private and Voluntary Sector Partner Organisations
- Community Organisations and Campaigning Groups
- Media and Journalists
- Any commentators or opinion formers that we may want to follow
- Citizens / Service Users / Visitors

We reserve the right to remove a profile from our network, particularly if it poses a significant and material risk to the company's reputation and credibility, or a significant and material breach of our obligations to maintain political neutrality.

Social Media Users



We have dedicated team of approved users who look after our digital channels on behalf of Glasgow City Council. You can find more information and contact details for the team on [Connect](#).

Responsibilities of Social Users

We expect the users of our social media to uphold our [Policies and Procedures](#) and adhere to the relevant strategies. Social users responsibilities include updating our social media channels as required, create content including writing copy, making content and working across services and departments to deliver the wider communications strategy.

Our users are accountable for the content they post on our social media channels, and all authors of posts can be identified through our social media management software. Regular review and monitoring of content will take place, and we reserve the right to change or revoke a user's Hootsuite access at any time if they are found to be in breach of our policies.

Training of Approved Employees

All approved social media users should be GOLD trained in the use of social media. This also includes employees who have access to partnership and/or ALEO accounts. Employees should undergo refresher training every year to ensure they are up-to-date with current trends and potential changes in our strategies.

Removing Inactive Users

All social media users will be audited on a regular basis by the Digital Review Board and Digital Communication Team. This is to remove inactive users while ensuring content remains in-line with our policies, strategies and guidelines.

Personal Use of Social Media

For guidance on personal use of social media, please refer to current policies, Code of Conduct produced by Human Resources.

What if an Employee Leaves?

Regular review will take place to ensure approved social media user list is up-to-date

If an employee who has access to social media leaves the organisation, their manager must notify Digital Communication Team. This includes if the employee should no longer have access to social media due to post change, or another change in circumstance.

Please email socialmedia@glasgow.gov.uk to inform the team of any changes to circumstance.

Protection of Vulnerable Groups



Due to the complexity and additional safeguarding required for both children, adults and employees, this policy provides additional advice and guidance for those who provide services to vulnerable groups.

Education Establishments

All education establishments should adhere to Glasgow City Council Social Media: Our Policy. Education accounts could be used for promotion of school activity to parents and stakeholders, and learning and service development, but accounts must not interact with children, in either public, or private messaging; please use approved apps for homework updates and any parental discussion.

Each establishment should:

- Produce its own strategy on the use of social media to promote school and pupil activity with a focus on understanding audience (e.g. Parent, Personal development or Professional Development etc)

- Nominate a social media manager to run their account(s). Please keep a record of authorised users, and employees responsible for safeguarding
- Manage account(s) through the Councils approved social media management software and follow [@GlasgowCC](#) on [Facebook](#) and [Twitter](#) for updates

Each establishment should only one account per platform to promote all year groups and departments to create a clear and authoritative voice for each school, but the choice of platform, type or account and development of accounts is at the discretion of each establishment.

There are many different types of accounts and platforms that can be used, but please choose the most appropriate platform for the audience noted within your schools developed social media strategy.

Please see [Glasgow City Council. Social Media: Our Strategies](#) for further platform guidance.

Public VS Private Social Media Accounts

By default, social media accounts are public. Many platforms allow for pages or accounts to be 'Locked' or 'Private', meaning the admin has to approve access to any follower or member of the account.

If your account strategy involves sharing content that contains imagery or footage of vulnerable groups, it is advised that you 'lock' your account(s) and keep an up-to-date follower list of known contacts to ensure those following the accounts are known to the service.

Please regularly review and remove any users that you feel should no longer have access to viewing your content e.g. parents of school leavers from a private group etc. If you are unsure or cannot verify any follower of your account, please block the user as per the platform guidelines.

If you choose to have an account, private or public, please adhere to the process outlined in our policy,

and be mindful of the potential risks and the privacy of those who may feature on your account. You should consider archiving and/or deleting old content that is no longer relevant.

Privacy and Associated Risk

Due to the nature of digital, there is a significant level of risk associated with publishing any content on the internet.

Whether you choose to have a public facing page, group or open account, or a private or locked account, anyone who has access to the internet across the world may be able to access and view your social media pages, and may save, copy or redistribute any content or images you have shared or posted online.

Any further distribution of content by third parties is outwith the control of Glasgow City Council, but we aim to reasonably manage any associated risks to the best of our ability by following the procedures outlined in this policy.

Image and Video Consents

Social media accounts should not use identifiable photographs or footage of vulnerable groups unless parental or carer consent is sought. Please find a consent form for download at goglasgow.org.uk.

These consents must be refreshed on a yearly basis and under no circumstances should an image be posted with details that may identify a child or dependant. Parents and carers reserve the right to remove consent at any time.

While some parents and carers may have given consent for the use of their dependants image on Glasgow City Council platforms, our consent forms do not cover parents and carers taking photographs of their own dependants, or others, within school premises, or within other establishments and distributing them on their own platforms. They must seek their own additional permissions.

Use of photo/film by others in protected settings

We understand individuals may seek to take photos or videos of their own dependants at events. If a parent or carer wishes to take photographs or footage within school grounds, permission from the school, and parents of any children featured, must be sought.

Please remind parents and carers to be respectful of the wishes of others who may not have given consent, and mindful of where, and with whom, they share any images.

Child protection and protection of vulnerable groups is at the heart of everything we do at Glasgow City Council. If we have any concern for a child or person's safety and/or privacy, we may, on occasion, ask individuals to refrain from and/or stop taking photographs and/or footage within our premises.

This action is taken on a case-by-case basis and is at the discretion of each establishment. Please refer to Education's [management circular 57](#) for further guidance on Child Protection.

Breaching this policy may result in individual(s) being asked to leave a premises and an education establishment has the discretion to cancel any activity. We ask for the co-operation of parents and carers with any request, given the nature of any concerns we may have.

Storage of Images

Image must not be taken on employee's personal devices, and once used for intended purpose, must either be deleted or stored appropriately.



What if I don't have consent?

If a child's parent or carer has not given consent to use a child's image, they must not appear in any visual or written content distributed by the establishment, Glasgow City Council, or by any parent or carer. This includes imagery taken during group activity.

We understand that a child may feel excluded by this if a photograph or video must still be taken, but there are many ways to include them in your content while protecting their privacy.

You could:

- Ask the child to help you decide what kind of content to post
- Ask the child to take the photograph or video for you
- Include the child by asking them to help to write the text for the post
- Only if it is absolutely unavoidable, and only if appropriate, emojis may be placed over the dependants full image to obscure their identity

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