

# **Dudley Council**

## **Social Networking Policy**

**Dudley Council: policy on acceptable usage of social networking facilities through the council's corporate ICT network**

**Final version**  
**November 2010**

**Document Control**

|                     |  |
|---------------------|--|
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| 27-04-10      | AS       | 1.0              | Second draft with marcomms and corporate ICT input  |
| 11-05-10      | LB       | 1.1              | Changes and naming to standards for appendices  |
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| 29-06-10      | RS       | 1.3              | Para 19 amended, to refer to safeguarding children and vulnerable adults, para 20 deleted |
| 18-08-10      | RMD/RJ   | 1.4              | Fourth draft with input from HR and safeguarding  |
| 29-10-10      | AS       | 1.4              | Re-drafted to shorten and appendices  |

**Document approvals**

This document requires the following approvals:

| Sponsor approval | Name | Date             |
|------------------|------|------------------|
| Corporate board  |      | 30 November 2010 |

**Document distribution**

This document will be distributed to:

| Name            | Job title | Email address |
|-----------------|-----------|---------------|
| Corporate board |           |               |

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**The purpose of this policy is to ensure:**

- That the council is not exposed to legal and governance risks
- That the reputation of the council is not adversely affected
- That employees are provided with clear guidance on what is acceptable use and the consequences of breaching this policy
- The safety of children and young people and vulnerable adults are not compromised as a result of employees action
- That our users are able to clearly distinguish where information provided via social networking applications is legitimately representative of the council and reinforces the brand of dudley.gov.uk

## 1 Introduction

This policy covers the use of social networking applications by council employees, elected members and by partners or other third parties (including contractors) on behalf of the council. These groups are referred to collectively as 'council representatives' for brevity. It relates not only to business use of social networking applications but also use of such applications whilst in the employee code of conduct See [Internet Acceptable Usage Policy](#) for further guidance

**This section applies to all employees who wish to request access to social media websites for work purposes that require monitoring and viewing only.** After reading this policy you will need to request access via the intranet form here which your directorate Information Risk Owner (IRO) will assess and consider your case. ([Link to electronic form](#))

**If you think you need to use social media websites to promote council business you will also need to read the appendix to this document. 'Promoting council business through web communications channels.'**

Social networking applications include but are not limited to:

- Blogs
- Any online discussion forums, including professional forums
- Collaborative spaces, such as Wikipedia
- Media sharing services, for example YouTube, Flickr
- 'Microblogging' applications, for example twitter

Our use of social networking applications can have implications for us as employees and in relation to our duty to safeguard children, young people and vulnerable adults. There are potentially specialist issues relating to children and vulnerable adults, which is why they are protected by local statutory Safeguarding Boards. [Expert guidance](#) and advice is provided in the appendix 'Social Networking & Safeguarding', and should be applied as appropriate.

## 2 Policy

UNCLASSIFIED

- 2.1 Use of social networking applications which are not related to any council services (for example, contributing to a wiki provided by a professional association) do not need to be approved by e-communications strategy board. However, you are not allowed to use council equipment for any personal social networking use. Council representatives must still operate in the line with the requirements set out in section 2.3 and 2.4.
- 2.2 Where applications allow the posting of messages online, users must be mindful that the right to freedom of expression attaches only to lawful conduct. Dudley Council expects that users of social networking applications will always exercise that right of freedom of expression with due consideration for the rights of others and strictly in accordance with these terms of use.
- 2.3 Terms of use for council managed social networking applications.
- 2.3.1 Must not be used to publish any content which may result in actions for defamation, discrimination, breaches of copyright, data protection or other claims for damages. This includes but is not limited to material of an illegal, sexual or offensive nature that may bring the council into disrepute.
- 2.3.2 When using council set-up social networks they must not be used for party political purposes or specific campaigning purposes as the council is not permitted to publish material which 'in whole or part appears to affect public support for a political party' (LGA 1986) see members code of conduct.
- 2.3.3 Must not be used for the promotion of personal financial interests, commercial ventures or personal campaigns.
- 2.3.4 Must not be used in an abusive or hateful manner.
- 2.3.5 Must not criticise or be abusive towards Dudley Council if you are engaging on social networking sites as an officer.
- 2.3.6 Must not be used for actions that would put council representatives in breach of council codes of conduct or policies relating to elected members or staff.
- 2.3.7 Must not breach the council's employee improvement and disciplinary procedure equal opportunities or grievance policies.
- 2.3.8 Must not breach the council's information protection policy.
- 2.3.9 Must not place any child, young person or vulnerable adult at risk of harm.

- 2.3.10 Must not target underage children. The minimum age for social networking sites is usually 13 years.
- 2.3.11 Must not accept friendships from underage children.
- 2.3.12 Where individuals from partner organisations are involved and are acting on behalf of Dudley Council, they will also be expected to comply with the relevant council policies.
- 2.3.13 Where individuals from partner organisations are involved and are acting on behalf of Dudley Council, they will also be expected to comply with the relevant council policies.
- 2.4 It is important to ensure that members of the public and other users of online services know when a social networking application is being used for official council purposes. To assist with this, all council representatives must adhere to the following requirements:
- 2.4.1 They must only use @dudley.gov.uk email addresses (or any other council approved e-mail mechanism) for user account which will be used for official council purposes.
- 2.4.2 Where there is a need for a managed social networking facility for council services, staff should refer to the second part of this document.
- 2.4.3 Council representatives should identify themselves as such where appropriate on social networking applications. For example, through providing additional information in user profiles.
- 2.4.4 Council representatives should ensure that any contributions they make are professional and uphold the reputation of the council.
- 2.4.5 Council representatives must not promote or comment on political matters or issues that may be regarded as such.
- 2.4.6 All users need to be aware that applications may be closed for a defined period before local and national elections in order to comply with legislation which affects all local authorities.

### 3 Risk

The legal risks and liabilities associated with the use of social networking technologies includes: (*Risks expanded on in appendix*)

- Risk and liability concerning personal data
- Risk and liability relating to copyright infringing content
- Risk and liability for content inaccessible to people with either a physical or mental impairment

- Risk and liability for defamatory and obscene content
- Risk to vulnerable groups
- Risk to professional status of employees

#### **4 Enforcement of employee behaviour**

If any user is found to have breached this policy, they may be subject to disciplinary action in line with Dudley Council's employee improvement and disciplinary procedure and may invoke safeguarding procedures. If a criminal offence is considered to have been committed further action may be taken to assist in the prosecution of the offender(s).

Any breach of the terms set out in the policy will result in the application or offending content being removed in accordance with the Corporate Code of Conduct and the publishing rights of the responsible council representatives being suspended immediately.

The e-communications team reserves the right to require the closure of any applications or removal of content published by council representatives which may adversely affect the reputation of the council or put it at risk of legal action.

#### **5 Monitoring**

All users should be aware that business internet usage is monitored and recorded centrally. The monitoring of internet traffic will be undertaken so that the council:

- Can plan and manage its resources effectively
- Ensures that users act only in accordance with policies and procedures
- Ensures that standards are maintained
- Can prevent and detect any crime
- Can investigate any unauthorised use

Monitoring will only be undertaken by staff specifically authorised for that purpose in accordance with communications and operation management policy.

These arrangements will be applied to all users and may include checking for the purpose of:

- Establishing the existence of facts relevant to the business, client, supplier and related matters
- Ascertaining or demonstrating standards which ought to be achieved by those using the facilities
- Preventing or detecting crime
- Investigating or detecting unauthorised use of the council's facilities
- Ensuring effective operation of council facilities
- Determining if communications are relevant to the business

Where a manager suspects that the facilities are being abused by a user, they should contact the ICTS Service Desk (ext 4922). Designated staff in ICT services can investigate and provide evidence and audit trails of access to systems. ICT Services will also comply with any legitimate requests from authorised bodies under the Regulation of Investigatory Powers legislation for this information.

**6 Policy compliance**

If any user is found to have breached this policy, they may be subject to the council's employee improvement and disciplinary procedure. If a criminal offence is considered to have been committed, further action may be taken to assist in the prosecution of the offender(s) and if the breach impact upon the professional standing of the employee, safeguarding procedures may be invoked which may result in a referral to your regulatory body.

If you do not understand the implications of this policy or how it may apply to you, seek advice from the principal information security officer.

**7 Policy governance**

The following table identifies who within the council is accountable, responsible, informed or consulted with regards to this policy. The following definitions apply:

**Responsible** – the person(s) responsible for developing and implementing the policy.

**Accountable** – the person who has ultimate accountability and authority for the policy

**Consulted** – the person(s) or groups to be consulted prior to final policy implementation or amendment

**Informed** – the person(s) or groups to be informed after policy implementation or amendment

|                    |  |
|--------------------|--|
| <b>Responsible</b> | Assistant director of finance (ICT & business transformation)  |
| <b>Accountable</b> | Treasurer – Section 151 Officer  |
| <b>Consulted</b>   | Assistant director ICT, head of marketing and communications, principal information security officer, strategy development manager, corporate web manager, HR and Dudley Safeguarding Children Board |
| <b>Informed</b>    | Members, all employees, all temporary staff, all contracts etc.  |



### Review and revision

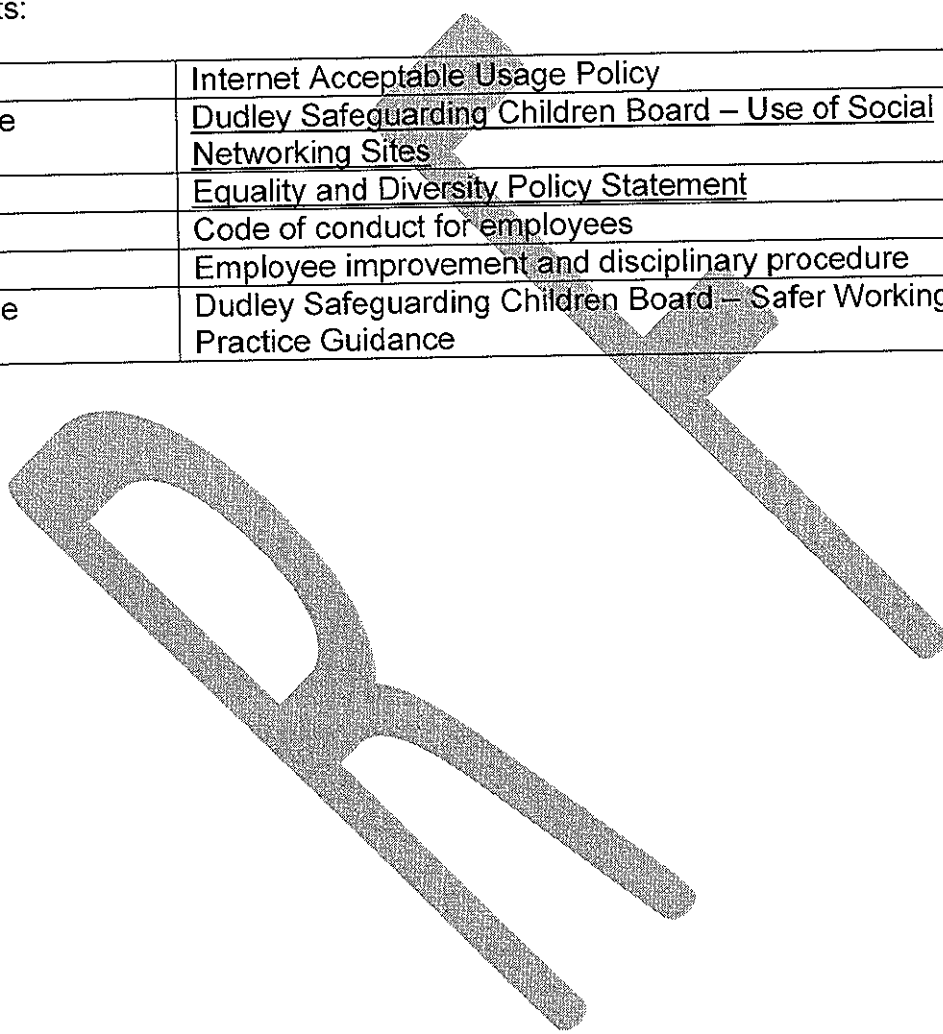
This policy will be reviewed as it is deemed appropriate, but no less frequently than every 12 months.

Policy review will be undertaken by the head of marketing and communications.

### 8 References and related documentation

This policy refers to and should be read in conjunction with the following documents:

|          |  |
|----------|--|
| Policy   | Internet Acceptable Usage Policy                                     |
| Guidance | Dudley Safeguarding Children Board – Use of Social Networking Sites  |
| Policy   | Equality and Diversity Policy Statement                              |
| Policy   | Code of conduct for employees  |
| Policy   | Employee improvement and disciplinary procedure                      |
| Guidance | Dudley Safeguarding Children Board – Safer Working Practice Guidance |



Appendix 1 - risks

- **Risk and liability concerning personal data e.g.**
  - Unintended release of personal data by the user
  - Inadequate privacy settings on the system
  - Potential breach of the Data Protection rights of the data subject
  - Not providing users the right to opt-out from advertising and marketing material
  - Identify theft
  
- **Risk and liability relating to copyright infringing content e.g.**
  - Copying, adapting and communicating contents without permission
  - Adding, removing or altering material without permission
  - Inaccurate or misleading content
  - Difficulties identifying an author for subsequent changed treatment of content
  - Multiplicity of authors could lead to disputes over copyright ownership
  
- **Risk and liability for content inaccessible to people with either a physical or mental impairment e.g**
  - Potential breach of obligations under the DDA causing disadvantage to disabled customers
  - Failure to meet duty to make "reasonable adjustment" if use inaccessible Web 2.0 functions
  
- **Risk and liability for defamatory and obscene content e.g.**
  - Blog contributors publishing defamatory materials could make the council liable by association
  - Inadequate "notice and take down" procedures for offending material
  - Potential breach of Obscene Publications legislation
  - Potential damage to council reputation
  
- **Risk to vulnerable groups e.g.**
  - Vulnerable groups could become victims of online grooming
  - Inappropriate use of images on social networking sites
  - Image morphing
  - Cyber bullying
  - Personal intimidation
  - Identification of vulnerable/at risk children
  
- **Risk to professional status of employees**
  - A referral to regulatory bodies in relation to employees e.g. for teachers General Teaching Council

## Appendix 2 – Promoting council business through web communication channels

### 1. Introduction and channel management

This section refers to the commissioning of the following channels via the corporate business case pro-forma:

E-communication channels currently include, but are not limited to:

- Any web pages or websites
- Collaborative spaces, such as Wikipedia
- Media sharing services, such as YouTube, flickr
- 'Microblogging' applications, such as Twitter
- Social networks, such as facebook
- Professional networks and sharing, such as Linkdin, Scribd
- Any online discussion forums

The council's marketing and communications team, with support from corporate ICT, is tasked with the responsibility of setting the standards and leading on the use of e-communications.

This guidance complements the council's internet policy.

### 2 Issues

The guidance provided in this document will help to minimise the e-safety risks associated with online communication. Risk cannot be removed entirely, but the council has a duty of care to all of its service users to protect their safety as far as is reasonably practicable. This is as relevant in the online world as in the physical world.

Whilst the majority of current advice and evidence focuses on young people, it is important to note that **e-safety issues can potentially affect all people who use online services**, for example:

- Vulnerable adults who may be at higher risk of being persuaded to share sensitive personal information
- Professional staff that may be at risk of misrepresentation and malicious accusations through social networking
- Elected members who may be at risk of receiving abusive messages where sensitive policy decisions are discussed online.

### 3 Editorial purpose

Discuss what you want to do first with your marcomms senior account manager or the head of marketing and communications *prior to filling in the business case pro-forma*. We will want to know, and this list is not limited to:

- What is the editorial purpose?

- How does this fit it with your overall editorial and marketing strategy and objectives?
- Could you achieve the same effect or better on dudley.gov.uk?
- Does the site appeal to a key demographic not available via dudley.gov.uk?
- Is this the right way to engage with your audiences?
- Does anything similar already exist?
- If it does, would working with an existing presence be better for users and for Dudley Council?
- What commitments are you willing to make to the site?
- Do you have the resources you need to keep it refreshed and relevant?
- For how long?
- How long the association between Dudley Council and the site/profile/page will last?
- What is your exit strategy? Neglected sites can damage the council's brand and reputation.
- How will you measure success? Set a target and a review point before you launch
- Will the benefits of communications outweigh your overall investment and/or in time and money?
- Editorial ownership will be discussed with your marcomms senior account manager
- The e-communication representative nominated by membership through the e-communications strategy group for each directorate will have overall responsibility for keeping a record of any informal, non-contractual pages/profiles/sites set up by their teams on third party social networking sites, and be registered on the appropriate marketing and communications planner
  - Has your social media manager been CRB cleared and appropriately trained in safeguarding?
  - Has your business case considered the potential risks and taken steps to mitigate any safeguarding risks?

#### 4. Use of the Dudley Council brand

All e-communications should reflect the Dudley Council brand and the logo should be used in accordance with the [Dudley Council brand guidelines](#).

- Any logos should, where possible, contain links back to the relevant page on dudley.gov.uk. If this cannot be done technically, the link should be as close as possible to the logo
- Any manifestations of the logo should be prepared by marketing and communications for the specific service.

If you have a query about the correct use of Dudley Council's brands, ask your marcomms senior account manager or the head of marketing and communications.

## 5 Enforcement of business use

Any breach of the terms set out below will result in the application or offending content being removed in accordance with the published corporate complaints procedure and the publishing rights of the responsible council offer being suspended.

The marketing and communications team and Dudley Safeguarding Children Board reserves the right to require the closure of any applications or removal of content published by council representatives which may adversely affect the reputation of the council or put it at risk of legal action and compromise the safety of vulnerable groups.

Any actions, communications or content that cause damage to the council by any of its employees or any third party's reputation may amount to misconduct or gross misconduct to which the council's employee improvement and disciplinary procedure apply.

The council will also co-operate fully with investigations where cases of online abuse warrant involvement of external enforcement agencies.

## 6 Standards

**The following guidance must be followed when new online services are being considered. It must also be retrospectively addressed by any existing online services which provide communication facilities.**

If you are in any doubt about any of the requirements outlined below, contact the head of marketing and communications for further advice. Misuse of online communications can have serious consequences – it is better to clarify any questions rather than make assumptions.

- 1.1 Marketing and communications must be informed of any proposals to develop new social networking services. It will be preferred that, where possible, proposals make use of existing online facilities available to the council that are relevant to the audience group.
- 1.2 Proposals must only be taken forward where it has been agreed with the relevant endorsement of the service assistant director and the head of marketing and communications and a member of the Dudley Safeguarding Children Board where the proposal has implications for vulnerable groups. Proposals which are deemed to present unreasonable levels of risk or duplicate existing facilities are unlikely to be taken forward. In cases where this cannot be decided by the head of marketing and communications and/or the relevant assistant director and Dudley Safeguarding Children Board where applicable, the proposal will be referred to the e-communications strategy board.

- 1.3 A risk assessment must be carried out to establish which features may present risks and how they should be managed. The checklist provided in the appendix should be used to carry out the risk assessment. The marketing and communications team can also advise on carrying out risk assessments of this type.
- 1.4 Named contacts for the following roles must be identified, documented and kept up to date. The marketing and communications team must also be provided with this information. Roles which must be addressed include:
- The responsible assistant director
  - The service or operational manager who will have day to day responsibility
  - Members of staff involved in the administration of the online service
  - Contacts in partner organisations or third parties who will have a role in providing the online service
- 1.5 Formal roles such as online facilitation or moderation of Council sites should be undertaken by members of the public or organisations with no formal involvement in service delivery. However, there may be exceptional circumstances where this is appropriate but this must only be done with the agreement of the head of marketing and communications.
- 1.6 Managers must ensure that guidance appropriate to the target user groups is developed and promoted to encourage users to follow good practice and act responsibly. Guidance should mirror existing sources such as the Dudley Safeguarding Children Board's guidance. The marketing and communications team can advise on other suitable sources of advice.
- 1.7 Managers must ensure that corporate security standards for the handling, storage and disposal of personal data are addressed. This include ensuring that the service is provided on servers with appropriate security features whether it is hosted within the council or by a third party. Managers must consult the head of marketing and communications and the principal information security officer and corporate web manager regarding security requirements.
- 1.8 Managers must ensure that content under the control of the council is created and maintained according to the corporate branding guidelines and content quality standards published in the marketing and communications toolkit section of the intranet.
- 1.9 Managers must ensure that corporately agreed terms of use, data protection and freedom of information statements are used or incorporated into statements provided to users where appropriate to do so. Consult the principal information security officer.

- 1.10 All council staff and elected members (whether directly involved in delivery or as other users of the service) must abide by the internet policy and must also act within the principles of the corporate employee and member codes of conduct.

### **Specific notes on using social media sites**

#### **7 Working with third party sites**

- 7.1 The responsibility for measures of protection and intervention lies first with the social networking site itself. We should never set out to duplicate measures of protection and intervention which the social networking site already takes e.g. against illegal or against harmful and offensive content, whether by using its own staff or by working with the community to alert them to breaches of the site's terms and conditions.

#### **8 Blogs and microblogs**

- 8.1 For personal use of blogs and microblogs, refer to the above. Also discuss this with your marcomms senior account manager.

#### **9 Advertising**

- 9.1 Users generally appear to accept that advertisements on areas of Dudley Council-branded social networking pages which are not under our editorial control (e.g. banner ads) are not our responsibility and are not connected with Dudley Council content. But you should stay informed about the full range of advertisements which appear on Dudley Council-branded pages and you should alert your marcomms senior account manager immediately if clearly inappropriate advertisements, for example involving pornography appear on the same pages.
- 9.2 Ultimately this may involve Dudley Council withdrawing the e-communications channel that is causing concern with its advertising standards.

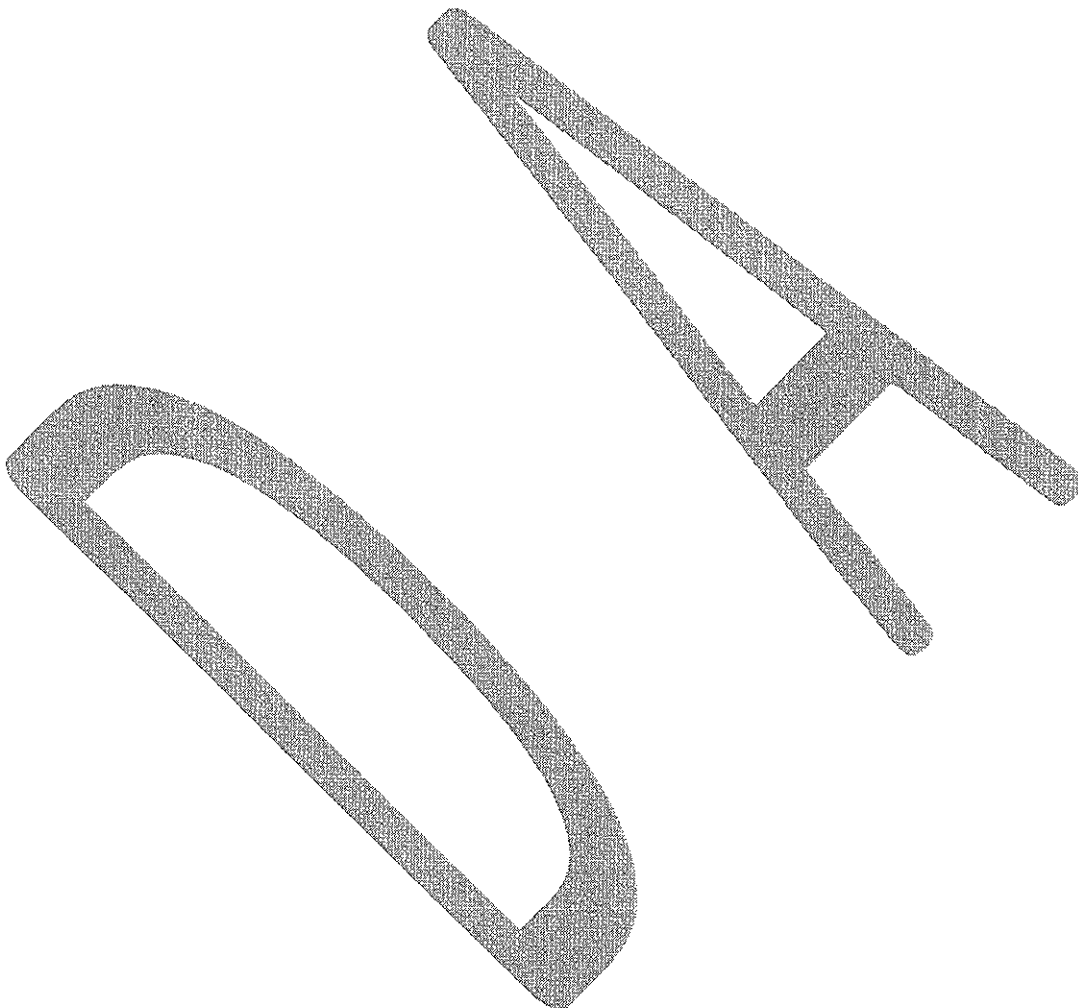
#### **10 Legal and rights issues**

- 10.1 Before we upload Dudley Council material or invite users to upload their user generated content to a page on a social networking site, we should make sure that we are aware of, and comfortable with the site's own terms and conditions. This is because by uploading our content, it is likely that we are agreeing to be bound by its terms.
- 10.2 Often the major third party e-communications channels are American wholly owned and hosted, and as such do not fall under UK data protection laws. Our users therefore will consent to collection and processing in the United States. They will consent to having their

personal data transferred to and processed in the United States. This remains out of our control and jurisdiction.

**Again always remember:**

If you are in any doubt about any of the requirements outlined, contact marketing and communications for further advice. Misuse of online communications can have serious consequences – it is better to clarify any questions rather than make assumptions.





### Appendix 3 - Safeguarding

Photographs and videos of children on websites and social networking sites can be used to identify children and make them vulnerable to people who wish to groom them for abuse. To counteract this risk, Dudley Safeguarding Children Board use of images guidance must be considered before any images are used:

- Consider using models or illustrations to promote an activity
- If a child is named, do not use their image
- If an image is used, do not name the child or young person
- Obtain written consent from adult with legal parental responsibility to use photographs

Images showing children and young people under the age of 18 years should not be used on the council social networking sites e.g. facebook, flickr, twitter due to the potential for:

- tagging of children and young people thus identifying them at a location and allowing the opportunity for abusers to identify and locate them on social networking sites
- morphing of the image
- cyber bullying and personal intimidation by posting derogatory, abusive and threatening comments

For the above reasons and the potential to post images of bullying and other inappropriate live incidents which occur offline, site content submitted by users should be moderated prior to publication wherever possible.

In the case of sites where user content can not be moderated prior to publication, such as facebook, sites should be reviewed on a regular basis. Inappropriate content that could potentially put a child at risk should be removed immediately. In all cases the child safeguarding measure implemented by the site provider should be observed, such as the nationally endorsed CEOP reporting button on facebook.

For more details and a sample use of images permission form, see the Dudley Safeguarding Children Board use of images guidance.

#### **When setting up social networking sites**

- Council representatives should keep the log in details to the account secure within the organisation which will reduce the risk of some one hacking into the online information.
- Council representatives should put on the social networking site information about how to contact the council directly, including a website address and contact telephone number. This allows the user to get in touch and verify that it is a council approved site.

- The social networking site should be promoted on the official council website. This will help users to find the social networking page and will reduce the risk of people finding fake profiles.
- The social networking site should have the appropriate privacy levels set. Consider the privacy and safety settings available across all aspects of the services – for photos, blog entries and image galleries – and set the appropriate level of privacy. Think about the target audience and who you wish to see the content. Failing to set appropriate privacy levels could result in messages which are defamatory, libellous or obscene appearing on your profile before you have a chance to remove them. This may result in significant personal distress, risk to the reputation of the council and require the intervention of the council, the service providers and possibly the police.
- Set the 'accept comment' setting so that messages can be checked. The 'accept comment' setting allows the social media manager to approve or pre-moderate a comment from another user, usually a 'friend', before it appears on their web page/profile. Ensure that you check all messages before they appear on your webpage / profile so you can block any inappropriate messages and, if necessary, report them to the service provider. This may not be possible with all social networking services. If so, you could contact the service provider to establish whether you can adjust the privacy and safety settings to suit your needs.

### **Safeguarding staff**

Due to the increasing personal use of social networking sites, employees should be aware of the impact of their personal use upon their professional standing. In practice anything posted on the internet will be there forever and is no longer in your control. Remember when something is on the internet even if you remove it, the chances are it has already been "snapshotted" by a "web crawler" and will always be there. Current and future employers and service users may see this. Keep all professional work completely separate from your private life.

The following, in addition to the above, will safeguard staff from allegations and protect employee's privacy as well as safeguarding vulnerable groups.

Social networking sites such as facebook have a range of privacy settings which are often set up to "expose" your details to anyone. When "open" anyone can find you from a search of the social networking site or even from a google search. Therefore, it is important to change your setting to "just friends" so that you details, comments, photographs can only be seen by your invited friends. However, always remember anyone who can access your site can potentially copy and paste your content into the public domain and make your images and comments visible to all.

Manage your social media reputation by:

- having a neutral picture of yourself as your profile image.
- not posting embarrassing material or comments that may call into question your employment status.
- not accepting friendship requests unless you know the person or want to accept them – be prepared that you may be bombarded with friendship requests from people that you do not know.
- choosing your social networking friends carefully and ask about their privacy controls.
- not accepting friendship requests on social networking or messaging sites from students, pupils, young people (or their parents) or service users that you work with, if it could be perceived as a potential risk. For those working with young people remember that ex pupils may still have friends that you may have contact with through your work with the council.
- Exercising caution, for example on facebook, if you write on a friends 'Wall' all of their friends may be able to see your comment even if they are not your friend.

There is a separate privacy setting for facebook groups and networks. You may have your own profile set to private, however, when joining a group or a network please be aware that everyone in that group or network are able to see your profile.

If you have younger friends or family members on your social networking groups who are friends with students, pupils, young people (or their parents) or service users that you work with, be aware that posts that you write will be visible to them.

- not using your personal profile in any way for official Dudley Council sites / business.
- not stating that you are an employee of Dudley Council.
- not using your personal contact details (email or telephone) as part of your profile.

### Tagging

You should be aware of the privacy settings on photo sharing websites.

If you or a friend are tagged in an online photo album (facebook, flickr) the whole photo album may be visible to their friends, your friends and anyone else tagged in the photo album.

You do not have to be friends with anyone to be tagged in their photo album, if you are tagged in a photo you can remove the tag but not the photo.

Your friends may take and post photos that you may not be happy about. You need to speak to them first to request that it is removed rather than contacting the web provider. When over the age of 18 the website will only look into issues that contravene their terms and conditions.

### **Friends, fans and followers of council sites**

You may wish to make “friends” on a third party web page. But remember that approving a “friend” may make other users of a site think they are more trustworthy. Check all friends carefully before you approve them. Look at their profiles first. If you have any doubts about whether you should approve a friend, discuss it with your line manager.

If you want to update your list of “friends” with a regular newsletter, make sure they are happy to receive it. Only use the list for activities on the same site or you may be in breach of the Data Protection Act.

If you want to make “friends” with an organisation (e.g. a company or a political campaign), consult your line manager first. Remember this is likely to give the impression that the Dudley Council is endorsing the organisation. Once accepted, some group “friends” have been known to change from an innocuous group into porn or gambling spammers group, so regularly review who you are associated with.

Do not target underage children for council sites and do not accept friendship requests from underage children. The minimum age for social networking sites is usually 13 years.

If you work or have contact with children or vulnerable adults in your council operations, then you must read the safeguarding board guidelines.