

EMAIL, INTERNET AND SOCIAL MEDIA POLICY

KEY POINTS

- Employees are required to give their line manager delegated access to their email account.
- You can only access a corporately approved email account.
- Email, Instant Messaging (IM) and internet facilities are primarily for business use – though occasional and reasonable personal use of WCC provided internet services is permitted.
- Employees' usage of email, IM and internet is monitored.
- All employees should take great care not to post anything on social media platforms that may be considered as bringing the Council into disrepute or post anything of an offensive, disrespectful or discriminatory nature towards the Council, managers, other employees, clients or associated people such as partner organisations or contractors.

1. Introduction

This policy has been created to inform employees of the expected behaviour when using email, IM and internet at work and encourages employees to think about their personal use of social media. The aim is to provide employees with the information they need to protect WCC and themselves and to understand the consequences it can have on their employment.

As a publicly accountable body, the County Council expects its employees to conduct themselves in an exemplary manner. Employees must not act in a way which conflicts with the interests of the County Council or may bring the County Council into disrepute. Employees must apply high standards of integrity in their use of County Council's email, Instant Messaging (Microsoft Yammer & Teams), internet facilities, data storage and social media.

2. Scope

This policy sets out the basis upon which the County Council gives access to its email, IM, data storage and internet facilities. The policy applies to:

- All employees
- Any users deemed as authorised, through a recognised verification process which would include, but not limited to:
 - All temporary/agency staff, consultants and volunteers engaged by the County Council;
 - All employees of partner or subsidiary organisations whilst at work and/or engaged on County Council business;
 - All Councillors when using IT equipment and IT facilities supplied by the County Council;

Any reference in this document to "employee" is deemed to be a reference to any of these above categories.

Email, Internet and Social Media Policy

This policy applies to employee use of email, IM, data storage and the internet, as provided by the County Council, regardless of how and when they are accessed.

3. Policy

- All employees given email, IM and internet access, are responsible for making themselves aware of the content of this policy (electronically or hardcopy)
- Only County Council employees and other authorised personnel (defined in the scope of this policy) can use the County Council's email, IM, data storage and internet facilities.
 - The County Council may withdraw a user's email, IM, data storage and internet access rights, where it considers it appropriate to do so.
- Employees are required to give their line manager or other authorised officer (nominated by the relevant Director) delegated access to their email account.
- Occasional and reasonable personal use of WCC provided internet services is permitted provided that:
 - It does not interfere with the performance of the employee's duties.
 - It does not incur additional costs for the County Council nor interfere with the running of its business.
 - It is not used to access, retain or distribute material of an illegal, sexual, discriminatory*, offensive or inappropriate nature.
 - It is not used in connection with any private commercial business or any activity which conflicts with the interests of the County Council.
 - It is not used in a way which breaches the County Council's conduct, equality, diversity and inclusion or dignity at work policies and procedures.
 - It does not bring the County Council into disrepute or impact on the council reputation.
 - It does not impact on productivity or working pattern.
 - The County Council expects employees to recognise that the email, IM, data and internet facilities are provided for business use. What constitutes reasonable and occasional personal use will depend on the context in which use takes place and employees should always seek clarification from their Managers. If there is any doubt about this issue employees should also be aware that they may be required to justify the extent of their personal use to their Managers.
- The County Council does not tolerate the viewing, downloading or distribution of media of an illegal, sexual, discriminatory*, offensive or inappropriate nature and such behaviour may be regarded as an act of gross misconduct which could lead to dismissal.
 - Media can include still images, photographs, cartoons, video clips, written words or sound recordings. Examples of inappropriate material would be that of a sexual nature, images of nudity, use of inappropriate language including swear words, violent images or other material which could be considered discriminatory*, defamatory or exploitative.
 - The County Council uses software capable of detecting access to material of sexual, discriminatory*, inappropriate or illegal nature. This is used for all access regardless of perceived intent i.e. personal or work related.
 - What may be acceptable to one employee may not be acceptable to other colleagues and as such, if employees are in any doubt whether some material

Email, Internet and Social Media Policy

is acceptable in the workplace, then they should not view or distribute that material. If employees accidentally encounter any material of this nature, they must inform their Manager or the ICT Service Desk as soon as possible.

- Any ICT usage, including email, social media, and IM or messaging systems within social media applications, an employee sends or shares, that is inappropriate, or which causes damage to the County Council, any of its employees or any third parties' reputation, may amount to misconduct or gross misconduct to which the County Council's Disciplinary Procedure applies.
- Employees' usage of email, IM and the internet are monitored (which includes lawful interception and content scanning) by or on behalf of the County Council. A log of usage is available to the HR Advisory Service via Information Security where there is reasonable suspicion that there is misuse of email, IM, data and internet facilities or some other form of misconduct.
- If employees wish to identify certain emails as personal, it is their responsibility to clearly mark the email as personal. However, WCC reserves the right to examine such emails as part of a wider investigation and will not be viewed unless legitimate reason to do so.
- Communications will be scanned using automated tools to detect malware and keywords as defined in the Data Loss Prevention standard.
- Employees must not impersonate any other person when using email.
- Employees must not modify their email account, such that it automatically responds to, or forwards, any non-WCC provided email via the internet, other than using the Out Of-Office function. Apart from corporately approved email services, no other webmail, or internet service with webmail functionality, should be accessed using WCC provided systems or devices; this includes personal email accounts, which fall outside of our corporate Microsoft controls.
- Our contract with Microsoft affords us very strict controls that protect WCC from an IT Security perspective. All council business should be conducted using the corporate email. Please check with ICT Service desk if you require further clarification.
- You must not download or import any unauthorised software, code or plugins/extensions onto the County Council's system. Please check with ICT prior to downloading if you have any doubt.

4. Using social media

With the ever-changing realm of social media, it is vital that employees understand developments in this arena, as there may be unforeseen consequences when using personal social media accounts; one of the aims of this policy is to give employees the information they need to protect both WCC and themselves. If employees use a social media account for WCC business use, they should also refer to [Corporate Social Media policy](#).

If you choose to create or participate in an online social network (or any other form of online publishing or discussion) and the views and opinions you express bring or potentially bring the Council, its customers, clients or any associated organisation into disrepute, a disciplinary offence will have been committed which may amount to gross misconduct.

- As an employee it is important to be aware that posting information or views about the Council can't be isolated from your working life. Any information (work related or personal)

Email, Internet and Social Media Policy

published online can, even with privacy settings become available for all to see and will contribute to your Online Digital Footprint.

- Remember postings on social media sites can be accessible to a very wide audience and can remain available for a very long period of time. Employees should therefore take great care not to post anything that may be considered as bringing the Council into disrepute or posting anything of an offensive, disrespectful or discriminatory* nature towards the Council, managers, other employees, clients or associated people such as partner organisations or contractors.
- Understand your personal online privacy settings – Check your settings and understand who can see the information published and your personal information. Be aware privacy settings will not necessarily safeguard you against disciplinary action. [See Social Media Guide](#) for helpful information re your personal social media account.
- If employees talk about the work they do or a WCC service they are associated with, they should make it clear that they are speaking for themselves and not on behalf of Warwickshire County Council. Beware even if you say you are not speaking on behalf of WCC if you are associated with WCC this still has the potential to bring WCC into disrepute. You may not mention your association with WCC but a friend could, or you may be known to be associated with WCC. Using a disclaimer such as: “The views expressed here are my own and do not necessarily represent the views of Warwickshire County Council” only offers very limited protection and it will not be a defence if you have or have potentially brought WCC, its clients, customers or associated organisations into disrepute.
- Be aware that even with privacy settings in place what you say can be distributed wider as friends can make comments and you are then indirectly bringing WCC into disrepute. Having personal online privacy settings in place will not be a defence to disciplinary proceedings for bringing or potentially bringing WCC into disrepute even if indirectly.
- Non approved instant messaging or messaging systems within social media applications should not be used from WCC provided devices.
- Do not let the use of social media interfere with your job, you should only access in your own time unless accessing a WCC social media account (see [Corporate Social Media guide](#)) for work purposes.

If an employee identifies themselves, or can be identified, as working for, or as a representative of, Warwickshire County Council on any social media or internet presence, that isn't directly controlled and authorised by WCC, then the employee has a responsibility to carry the spirit of this policy into their personal life. A breach of the Social Media Policy using personal devices away from the workplace can amount to gross misconduct.

Where individuals from partner organisations are involved and are acting on behalf of Warwickshire County Council, they will also be expected to comply with this policy.

A breach of any part of this policy may be regarded as misconduct to which the County Council's Disciplinary Procedure applies and which may lead to dismissal and may also result in legal claims against you and the County Council.

During the investigation of any incident, WCC will consider many factors in assessing whether dismissal is appropriate. Such factors include:

- the nature and severity of the comments made by an employee

Email, Internet and Social Media Policy

- the subject matter of those comments or the extent of the damage caused to an employer's reputation
- the severity of the damage that could potentially have been caused or whether there has been a breach of confidentiality
- whether the comments made by an employee were made during working hours and/or using the employer's equipment
- whether there are any other mitigating factors.

Any decision to discipline an employee for alleged social media misconduct should be based on a fair and unbiased consideration and assessment of such factors. This Policy is drafted with reference to the:

- Information Commissioner's Employment Practices Data Protection Code, Part 3: Monitoring at Work, issued June 2005.
- Human Rights Act 1998
- Regulation of Investigatory Powers Act 2000 (RIPA)
- Lawful Business Practice Regulations 2000
- Public Order Act 1986

5. Guidance & Support

For guidance on the policy please contact the Human Resources Advisory Service via hradvice@warwickshire.gov.uk or on 01926 412370.

For technical advice and support please contact [ICT Service Desk](#) on 01926 414141

*discriminatory material includes but not limited to racist, homophobic, transphobic, ageism, disabled, sexist and/or discriminatory religious/ belief materials.