

Social Media Policy

Purpose

This policy provides guidance on the use of social media. The policy supports the use of social media to maximise its benefits, whilst minimising the risks and any potential issues arising for anyone associated with the Programme. This document sets out guidelines to everyone associated with the Programme for both personal and corporate use of social media.

For the purposes of this Policy the definition of social media includes, but is not limited to, social networking sites (for example, Twitter, Facebook, LinkedIn, Instagram, YouTube), blogs, message boards, chat rooms, electronic newsletters, online forums and other sites and services that permit users to share information with others.

This policy applies to employees, secondees, agency/interim workers, consultants and contractors working on the Houses of Parliament Restoration and Renewal Programme. Any breaches of the policy will be handled in accordance with the relevant disciplinary procedures.

Principles

The External Affairs Team for the Houses of Parliament Restoration and Renewal Programme Sponsor Body is responsible for:

- The Programme's social media strategy for the Sponsor Body and Delivery Authority.
- Managing all its corporate social media channels and approving all content prior to publication.
- Handling all media inquiries.
- This document sets out guidelines to everyone associated with the Programme for both personal and corporate use of social media.

Corporate Social Media

- 1. The External Relations Team owns the social media strategy for the overall Programme (Sponsor Body and Delivery Authority), manages all its corporate social media channels and approves content prior to publication.
- 2. No corporate social media accounts relating to the work of the Programme should be set up without the express permission of, and oversight by, the External Affairs Team. This applies to employees, secondees, agency/interim workers, consultants, suppliers and contractors.
- 3. It is recognised that the Programme will increasingly use social media to share information and seek feedback as work progresses. It is vital therefore that no corporate social media account relating to the work of the Programme is set up without the express permission of, and oversight by, the External Affairs Director.
- 4. It is appreciated that external partners, suppliers and contractors may wish to post content relating to their work on the Programme on their corporate social media accounts (including, but not limited to Twitter, Instagram, Facebook, LinkedIn and YouTube). However, they must receive authorisation in advance from the External Affairs Team. This should be done for all posts, either individually or in batches.
- 5. Any new images of site or construction work must be authorised in advance of publication by relevant parties such as External Affairs Director, and the Health and Safety Manager for purposes of confidentiality, security and health and safety. The method of obtaining new



photographs may also require health and safety review, if the means to take the photographs puts the photographer at undue risk (for example if taking the photographs requires accessing scaffolding or the roof, or abseiling).

- 6. Appropriate permission must be obtained to use third party copyrights, copyrighted material, trademarks, service marks or other intellectual property. Use of social media to share information must always take account of the key principles outlined in the Data Protection Act 2018 and the General Data Protection Regulations.
- 7. Any media inquiries generated by social media posts should be directed to the External Affairs Team, who will work with all concerned to coordinate the response.
- 8. If anyone encounters a situation on corporate accounts that threatens to become antagonistic, the individual should disengage from the dialogue in a polite manner and seek the advice of their line manager or a member of the External Affairs Team.
- 9. Every member of staff carries responsibility as an employee, or as a representative of the Programme, when using social media. This includes the expectation that individuals should carry out their professional duties with complete political impartiality and should not influence or attempt to influence others through personal political opinions or preferences via or in association with the Programme's social media.

Personal Social Media

We expect and understand that many staff will already have social media accounts. These guidelines set out the Programme's expectations about how individuals should conduct themselves on social media. If you have any doubts about any aspect of social media, please speak to your line manager or a member of the External Affairs Team.

Individuals must adhere to this policy when accessing social media either on computers, laptops, tablets or smart phones owned or controlled by the Programme, or on personal devices, in accordance with the Acceptable Use of Digital Services Policy and Bring Your Own Device Policy.

External partners and contractors may have their own policies in place that complement this Social Media Policy.

- 1. Anyone using social media in a personal capacity should make clear that their accounts are personal and that they are not posting in a professional capacity, for example, adding "views my own" to a Twitter biography.
- 2. Everyone should be aware of the effect their actions may have on their own reputation, as well as that of the Programme's. The information posted or published may remain public information for a long time in line with Data Protection Act and General Data Protection Regulations.
- 3. Everyone should use their best judgement in posting material on social media platforms, in particular material that could be judged to be potentially inappropriate or detrimental to the Programme, its associated resources and its stakeholders (including both Houses of Parliament). The Programme may observe content and information made publicly available through social media.
- 4. Any member of staff who brings the Programme into disrepute when using social media, for example by engaging in comments or activity which could potentially damage or undermine the reputation or public confidence in the Programme, could face disciplinary action in accordance with the relevant disciplinary procedures. Although not an exhaustive list, some



specific examples include posting commentary, content or images which are defamatory, discriminatory, proprietary, harassing or libellous.

- 5. Individuals are encouraged to repost or retweet content from the corporate social media channels on personal accounts, should they wish to, to broaden the distribution of Programme content. However, individuals should not post any unofficial Programme content unless approved by the External Affairs Team. If in doubt, please consult the External Affairs Team.
- 6. Any inquiries about the Programme received on personal social media accounts should be directed to the External Affairs Team. This includes inquiries from the media, members of both Houses of Parliament, and other stakeholders.
- 7. Information that is considered confidential must not be published, posted or released. If there is any question about what is considered confidential, the individual should seek authorisation from their line manager and the External Affairs Team.
- 8. Anyone associated with the Programme should be aware that the Public Interests Disclosure Act 1998 gives legal protection to employees who wish to "whistle blow" any concerns. The Act makes it clear that the process of "whistleblowing" or "speaking up" involves raising the issue internally at first. Using social media to whistle blow is not considered appropriate and all staff should raise concerns through the Whistleblowing Policy.

Review

This policy will be reviewed annually, over the life of the Restoration and Renewal Programme, or sooner if there is a specific legislative, regulatory or service requirement, or a change in practice.

Sarah Johnson On behalf of the Sponsor Body June 2020 David Goldstone On behalf of the Delivery Authority August 2020