

# Social Media Policy



## POLICY SUMMARY

This is a review and update of HIE's social media policy. It provides advice and guidance on the benefits, legal considerations and best practices when using social media in relation to HIE. New content reflects changing platforms, additional advice in relation to photography and permissions, and the addition of moderation guidelines for users of our social channels.

### Contents

1. Policy Statement
2. Scope
3. Principles
4. Principles in detail:
  - 4.1 Protect
  - 4.2 Disclose
  - 4.3 Connect
  - 4.4 Common Sense
  - 4.5 Ownership
  - 4.6 Customer Service
  - 4.7 Politics
  - 4.8 Breach of policy
5. Training
6. Related policies/guidelines
7. Monitoring and review

## 1. Policy Statement

Social media use is a part of life today for individuals both personally and professionally. At Highlands and Islands Enterprise (HIE), we encourage all employees to use social media the right way to collaborate and promote our region, and this policy should help you do that. You should read this document, even if you are not using HIE's official social media channels.

We've written this policy to help you:

- Build stronger, more successful customer relationships
- Participate in global conversations related to the work we're doing and the activities we're involved in
- Reach more customers cost effectively
- Promote what HIE does through open and honest conversations
- Maintain clear distinctions between your personal and professional use of social media.

The guidance contained in this policy is non-contractual and does not form part of any employee's terms and conditions of employment.

## 2. Scope

This policy applies to all employees of HIE as well as contractors, consultants or any third-party organisation who are creating or contributing to social networks, blogs, wikis, discussion forums, or any other kind of social media, either on behalf of HIE or in support of HIE using other platforms and channels.

You can find more guidance and information about communicating internally and externally in our [Marketing and Communications](#) section of the intranet.

## 3. Principles

The policy covers the following principles:

1. **PROTECT**
2. **DISCLOSE**
3. **CONNECT**
4. **COMMON SENSE**
5. **OWNERSHIP**
6. **CUSTOMER SERVICE**
7. **POLITICS**
8. **BREACH OF POLICY**

## 4. Principles in detail

### 4.1 PROTECT

**Protect information:** Social media encourages you to share information, connect with people and build relationships. You need to remember though, as an HIE employee you have access to confidential information that should not be made public.

Don't publish information that is sensitive or may be considered confidential about HIE, its projects or its customers and stakeholders. It may be the case that it is inappropriate to share information and we may need explicit permission to do so.

If you are sharing content from your personal social media account which relates to your work, then remember to tag in our HIE account. We can then share through our channels. If you'd prefer to forward content to us to share directly from HIE then get in touch.

**Follow the law:** What you write is your responsibility. Always remember, if you're online, you're on record. If you're unsure about something, don't publish it. Off limit topics include (but aren't limited to) unapproved financials, litigation, unpublished product information and projects that have not been approved. You should consider copyright, brand identity, intellectual property – is it your right to publish the information?

Copyright is an important issue in any form of communication. You must not use someone else's images or written content without permission.

Social media provides a great opportunity to share information on what HIE does, and to showcase your customers and the region. You can send the marketing team content you'd like to have considered for HIE channels. Or get in touch if you'd like advice on posting work related content on your own personal channels.

If you are sharing information or photographs of people in relation to your work – ask permission before you publish. Photographs of identifiable people and places are subject to UK General Data Protection Regulation.

Wherever possible use HIE's model release form to capture people's consent. This also has the benefit of confirming where they are content we use the material – i.e. for a case study, appearing on our website, being shared by partner organisations.

Sometimes this approach may not be possible, for instance if you're at an event. Even if there is event permission in place for photographs, you should still:

- Consider if you can compose your shot to avoid having identifiable people in it.
- Ask for verbal permission where any individuals or groups are the focus of the shot.

**Do not use or share any images which have children and young people in them without written permissions from someone with parental responsibility.**

We want to be transparent, share as much information as we can and have an environment where we collaborate with clients and partners, we must also ensure our clients are confident that we will not share information where it is not appropriate to do so, especially when publishing information that can identify individuals. More information can be found in HIE's **Data and knowledge sharing guidance** and the [United Kingdom General Data Protection Regulation \(UK-GDPR\)](#).

**Mind your manners:** Don't publish anything that can be deemed defamatory, discriminatory, offensive, or obscene. Examples of this are outlined in HIE's **Disciplinary Policy**.

**External affiliation:** HIE is a public body. As an employee, you are expected to appear impartial and act with moderation and discretion around political and contractual issues. For further information refer to the **Staff Code of Conduct** and **Conflict of Interest** policies.

**Don't overshare:** When sharing information, consider the source – is it credible and should you be associated with it? Again, if in doubt, speak to the Marketing and Communications team.

**Use of social media at work:** we encourage employees to make reasonable and appropriate use of social media as part of their work. However, you should not be engaged in personal/non-work-related activity which interferes with your productivity.

**Storing photographs:** Photographs taken in relation to your work are subject to freedom of information and the UK GDPR. You must:

- Delete files from your device after sending them to HIE marketing with model release.
- Delete the image/footage from your device files after agreed use on social media.

This ensures photographs are subject to HIE's retention policies.

Contact HIE marketing if anyone raises concerns about any post for privacy or other issue. We're here to help.

## 4.2 DISCLOSE

**Be transparent:** You should feel free to share published HIE content without comment (e.g. re-tweeting or sharing a Facebook post). However, if you're talking about HIE online or endorsing a post from HIE, you should disclose that you work for HIE, either in your post or in your bio.

**Be honest and open:** if you have a vested interest in something you're commenting on, state it.

**Be yourself:** if you publish to sites out with the HIE channels, please add a disclaimer such as "Content views and opinions are my own."

**Be up to date:** If you leave HIE, please remember to update your status on social sites. You still need to observe confidentiality after you leave so consider this before you publish anything that can be linked back to your time with HIE.

**Be responsible:** You should feel free to take part in conversations and answer questions relating to your area of responsibility at HIE. However, if you aren't an authority on a subject, don't comment or respond. Direct the correct person to the conversation.

If you see a conversation that shouldn't be happening, or a complaint or negative comment about HIE, contact the Marketing and Communications team.

## 4.3 CONNECT

**Be nice, have fun and connect:** social media is the place to have conversations and build connections whether you're doing it for yourself or for HIE. Conversations will be much more rewarding than pushing agendas so start the chat and engage.

If you are planning to use your own social media account to share and promote HIE content or identify yourself as a member of HIE staff, you should avoid posting anything that may reflect badly on HIE, such as overtly political content and anything derogatory, or potentially offensive.

#### 4.4 COMMON SENSE

**Blurred lines:** In a social media world, the lines between personal and professional are very blurred. By simply identifying yourself an employee of HIE, you are creating perceptions about your expertise and about HIE. Always consider this before you publish, both personally and professionally.

Try not to get drawn into protracted tit for tat conversations. Consider if you can redirect the conversation offline. Speak to the marketing and communications team for advice.

HIE promotes the region, its successes and opportunities. Sharing update posts when visiting clients etc. is great content, as is celebrating awards, and highlighting events we're attending. Please remember to protect potentially sensitive information as appropriate and always get consent for taking images of people. Be aware we do not endorse companies or contractors, so in work related posts better to stick to factual information/activities.

**Made a mistake?** We're all human and sometimes mistakes happen. The important thing is to fix it. If you are in any doubt, contact the Marketing and Communications team, but some common fixes include:

- **X (formerly Twitter):** you can't edit tweets so either delete your tweet and put out a corrected version, or re-tweet with a correction if the original tweet has had a lot of engagement you don't want to lose.
- **Facebook:** You can edit posts, so log in to your account and make the required change.
- **LinkedIn:** If you notice an error immediately after posting you may wish to delete and repost. You can edit your posts, and this is the best option if you already have comments, shares and likes. Be aware those who have seen your post won't be notified it's been changed. Edits made within an hour can adversely affect your reach.

#### 4.5 OWNERSHIP

HIE owns accounts on most of the major social media channels and these are classed as HIE property. If you leave, you cannot take them with you, change the passwords or retain any of the data associated with the accounts. Do not pass on passwords to colleagues, if anyone needs access to the HIE social media accounts; they should speak to the Marketing and Communications team.

**New accounts:** If you want to publish on HIE's behalf you should first consider doing so on the primary HIE accounts, rather than a new one. This helps create transparency around HIE's role, builds reputation and manages resources much more effectively. If you think you have a case for a new account or want to establish an account on a channel we're not currently using, please speak to the Marketing and Communications team. No new accounts should be set up without permission.

**Using your own account for HIE related content:** There are several staff across the organisation who operate their own social media accounts which identify them as HIE staff and are used to promote

HIE, our region and our products and services. We support and encourage this approach, however, please note that if you leave HIE, you will need to update your profile and biography to make it clear that you no longer work for HIE.

#### **4.6 CUSTOMER SERVICE**

HIE supports free speech. We will not stand for anything that is defamatory, inaccurate, uses offensive language or is offensive, however, if a post or comment is not flattering but is in context, we won't delete it. If you are in any doubt, check with the Marketing and Communications team before publishing.

We would recommend that you don't engage in public debates with critics – don't take the bait! It might sometimes be appropriate to issue a factual correction but leave it there.

If you notice any inappropriate content on our social media channels, please report it to the Marketing and Communications team and BIIA.

We aim to respond to customer enquiries within 24 hours, even if it is just a holding message as part of our customer service charter so this applies to social posts or direct messages too.

Here are our guidelines for users. These are available in our 'About Us' sections of the platform.

*We welcome your opinions and contributions on our platform, and we don't delete, moderate or block content as long as posts:*

- 1. respect other people. Comments should not be malicious or offensive in nature, and should not constitute a personal attack on any identifiable person's or group's character/s or professional ability;*
- 2. don't constitute anti-social behaviour such as spamming or trolling, including excessive disruptive posting, and off topic posts. Comments should also be concise.*
- 3. don't incite hatred on the basis of race, religion, gender, nationality or sexuality or another personal characteristic. Don't include swearing, hate-speech, or obscenity;*
- 4. don't break the law - this includes defamation, condoning illegal activity, and breaking copyright;*
- 5. are free from overtly political content;*
- 6. don't advertise commercial products and services.*

*We reserve the right to suspend comments at any time, and to terminate involvement with anyone who posts inappropriate content. You can contact us at [enquiries@hient.co.uk](mailto:enquiries@hient.co.uk)*

Please see HIE's Unacceptable Actions policy for guidance on our approach when a customer's behaviour is considered unacceptable.

#### **4.7 POLITICS**

You should remain politically neutral when acting or posting on behalf of HIE. On personal social media channels where it is obvious that you work for HIE, such as LinkedIn or where you mention HIE in your bio, you should make it clear that any political views expressed are your own not HIE's. This could include things like Brexit, Scottish independence, or support for a political party.

#### 4.8 BREACH OF POLICY

For HIE employees, any breach of this policy will be dealt with as outlined in HIE's **Disciplinary Policy**.

Where a breach of the policy involves a HIE contractor this will be investigated and discussed with the contractor. Where a contractor has breached the policy the breach will be managed as outlined in the terms and conditions applying to the contract.

Note: If you have any questions about this policy or related guidance, please contact the Marketing and Communications team or email [hie.marketing@hient.co.uk](mailto:hie.marketing@hient.co.uk)

### 5. Training

HIE will ensure that an on-going training plan is developed to ensure the identification of key management and staff groups to be trained. HIE will also ensure that systems are in place to communicate the policy to new employees during their induction to HIE.

If you are interested in social media training, please contact HR Team by email to [HRHelpdesk@hient.co.uk](mailto:HRHelpdesk@hient.co.uk).

### 6. Related policies/guidelines

Information relating to HIE (including our employees, customers, partners and stakeholders) that is shared through social media remains subject to our Conflict of interest; Codes of Conduct; Data Protection; Freedom of Information; Records Management; Information Security; Equality, Diversity and Inclusion, Unacceptable Actions and Disciplinary policies. [See our policies page here](#). Other legislation, such as the United Kingdom General Data Protection Regulation, Freedom of Information (Scotland) Act and Copyright, Designs and Patents Act, could also apply.

### 7. Monitoring and review

<b>Policy Owner:</b>	Marketing and Communications	<b>Last reviewed:</b>	July 2024
<b>Review in:</b>	2 years		