



For discussion

Title: Personal use of social media policy

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Introduction and scope

1. This policy sets out expectations for the personal use of social media by staff and board members at the Cairngorms National Park Authority as members of a public sector organisation in Scotland. It seeks to provide clarity on the boundary between online and offline activity, and to support social media users to help balance their online presence with their role as an employee / board member of the organisation.
2. Social media is an important and valuable part of many people's lives, offering opportunities for connection, learning and engagement. However, there are inevitably personal and organisational risks associated with social media use, including the potential to put an opinion or comment in writing permanently into the public domain. Staff and board members should be aware of this in complying with the wider policy and standards expectations of their roles.
3. Activity within social media platforms brings wider considerations of whether staff or board members may be perceived to be acting in their personal or Park Authority capacities. A key consideration here is about the perception of others. We may not always be able to fully control that perception, nor understand how others come to develop their perception of us as acting either as private individuals or as members of the Park Authority. You should be mindful, therefore, that your perception of when you are carrying out official business and when you are acting privately may be different to how it is viewed by a member of the public. This policy document supports staff and board members in their use of social media and complying with wider expectations of staff and board conduct.
4. This policy applies to use of social media both during and out with working hours and applies regardless of whether accounts are accessed using Park Authority equipment or not.



5. Please note, any allegations of misuse of social media, or breaches of this policy by staff will be investigated by the HR team and could lead to disciplinary action. Any issues arising from board members' use of social media is covered by the provisions of the Park Authority's code of conduct, supported by the guidance issued by the Standards Commission for Scotland, and will be managed according to relevant procedures for managing complaints made on board members' activity.
6. All documents referred to throughout this policy are linked to in the bottom of the document.

Managing personal social media accounts

7. Staff and board members are entitled to privacy and to their exercise of free speech when expressing their personal views, and the organisation supports personal social media use for those who wish to do so. Equally, there is an expectation that – in acting either as members of staff or as a board member – you will collectively support and uphold the decisions and support agreed direction and work of the organisation.
8. The Park Authority expects staff and board members to take responsibility for managing their online presence to ensure that it does not risk conflicting with the work, policies or reputation of the organisation. This applies regardless of whether social media accounts are public or private.
9. Any requests received through social media, for example media or information requests, should be routed through standard internal channels and not responded to through social media.
10. As members of a Scottish Government non-departmental public body, interactions online and in person should align with the organisational code of conduct and principles.
11. Park Authority staff and board members are important and influential messengers within their own communities; sharing social media posts from the Park Authority feeds is therefore welcome, but not mandatory. The Park Authority has an organisational policy of a right to disconnect and so there is no expectation that staff engage in work related conversations on personal social media. It's worthwhile



remembering that sharing Park Authority posts may indirectly link staff and board members to their position in relation to the organisation, so individuals should consider whether this is something that they are happy with.

12. Regardless of whether staff and board members state their place of work or not, social media users can often easily be traced to their employers. This is particularly the case in small, rural communities, where staff and board members may have a high profile and through that clear links to the Park Authority.
13. It can be difficult for people to separate their own perception of you as an individual and as someone associated with the Park Authority, and so staff and board members have a duty to consider how their personal online activity reflects on the organisation. For example, comments made about the Scottish Government's approach to affordable housing, a planning application, fire management within the National Park or species reintroduction may be interpreted as an organisational position and lead to complaints, queries or media coverage.
14. Another example could be where a board member, who includes being on the board of their public body in their X / Twitter profile, retweets a post which contains a description of the service provided by their public body as being substandard and unacceptably poor. While the post in question was not written by the member, the fact that they have chosen to retweet in circumstances where they are identifiable as a member, could be seen as being supportive of the criticism in their capacity as such.
15. The consideration of whether you will be perceived on social media as acting as a representative, board member or employee of the Park Authority when interacting on social media is covered by the Standards Commission's guidance, which gives helpful advice for both staff and members. Their guidance states:
 - a) "It may be helpful, in certain circumstances, to state that you are expressing your own personal view, rather than the view of your public body. You should, however, always be mindful of how you could reasonably be perceived when doing so and whether your comments could objectively be considered as reflecting the views of your public body, regardless of any statement about it being a personal comment. It can be very difficult to persuade people that you can take a different view, or even have an open mind, in your capacity as a member of a public body from a view you may have expressed in your personal capacity. This is particularly pertinent in respect of using social media, or



commenting in the press, where the separation of public and private comments may be unclear to someone reading them, and where information about your membership of the public body may be readily available online or from different sources (including your public body's website)."

16. Staff and board members using social media must ensure that their comments or interactions online do not overtly or inadvertently reveal private, confidential or sensitive information gained through work with the Park Authority.
17. There is a permanence to any material shared or interacted with online, even if it is deleted, and a potential for content to be taken and shared without context, or to suit specific agendas.
18. It is the responsibility of staff and board members to check their privacy settings to ensure that they are aware of and comfortable with who can access content posted, shared, commented on, saved or interacted with in any way. However, even the most stringent of privacy settings do not entirely remove the risk of posts being shared beyond their intended audience.
19. If staff and board members receive any media requests through social media, or enquiries from the public related to Park Authority work, these should be flagged urgently with the Communications team prior to any response.

Minimising risk on social media – guidance

20. To support staff in using social media, whilst managing the risks associated both to the organisation and themselves, we've developed some do's and don'ts. If in any doubt, the Communications team are happy to advise and support in this area.
21. Do:
 - a) Share Park Authority content from the organisational social media channels and website if you would like to.
 - b) Be mindful of the staff or board code of conduct and your responsibilities as an employee / board member of a public body.
 - c) Keep personal and professional accounts separate, and do not create materials using organisational logos or brand assets without permission.
 - d) Include a line in your social media bio that states 'Views expressed are my own'. Be aware that it is not guaranteed that this will be seen, cannot be guaranteed to



change others' perceptions of you as a member of staff or board, and does not remove the need to act in line with the policy.

- e) Ensure that any comment you make that is associated with Park Authority work is in line with the organisation's key messages, supportive of the decisions taken and / or direction of agreed activity and only contains information that is already in the public domain.
- f) Be aware that taking positions, even on your private account, that contradict the position or values of the Park Authority could cause reputational harm and lead to investigation / disciplinary action.
- g) Speak to the Communications team for advice and guidance before setting up any account that is specifically dedicated to talking about your work.
- h) Route any information or media requests through standard internal channels rather than responding on social media
- i) Think before you post; consider whether you would say this in person and bear in mind that content can be screenshotted and shared in perpetuity, even after it is deleted.
- j) Flag any inflamed debates or conversations about the Park Authority to the Communications team as soon as possible through work contact details, rather than personal contact details, or the communications@cairngorms.co.uk inbox.
- k) Check and maintain your privacy settings so that you are aware of who can see your content.
- l) Ensure you have complied with the law including defamation, contempt of court, copyright, data protection, employment and equalities or harassment provisions.

22. Don't:

- a) Assume no one can see your content because you only have a small number of contacts.
- b) Enter debates on sensitive topics or respond to criticism about the Park Authority, even if you're directly tagged, unless you are absolutely confident that your response is in line with the organisational position, that you have considered all possible sensitivities, and that this will not risk any negative repercussions.
- c) Comment on or share views on issues that could reflect negatively on / undermine the reputation of the organisation, including issues like the closure of a service, a local funding decision or wider political conversations.
- d) Engage in protracted conversations or debates about the work of the Park Authority on your personal account, even if directly approached. Instead, speak to the Communications team for support and advice.



- e) Share information about the Park Authority or knowledge that is private, confidential or sensitive, gained through your interaction with the organisation. This includes detail about individual staff or board members involved with making any decision.

23. If you become aware of a colleague or board member of the Park Authority engaging in online behaviour which you feel contradicts this policy or the staff code of conduct, this can be raised with your line manager and / or HR.

Associated policies and guidance

- a) [Staff code of conduct \(Appendix four of handbook\)](#)
- b) [Board code of conduct](#)
- c) [Register of interests policy](#)
- d) [Dignity at work policy](#)
- e) [Privacy settings online – link to resource](#)
- f) [Standards Commission advice note for members](#)
- g) [Standards Commission model code of conduct guidance](#)
- h) [Brand and tone of voice guidelines](#)

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