



SOCIAL MEDIA POLICY FOR EMPLOYEES

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This document is held by Tamworth Borough Council, and the document owner is Communications.

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Revision History

Revision Date	Version Control	Summary of changes
	01.01.01	Draft for consultation
August 2020	01.01.02	Draft for consultation
July 2021	01.01.03	Approved final version

Approvals Creation and Major Change

Name	Title	Approved
TULG	Consultation	October 2020
CMT	Corporate Approval	September 2020
Appts & Staffing	Approval	

Approvals Minor Change and Scheduled Review

Name	Title	Approved

Approval Path

Major Change

Originator
Assistant Director People
TULG
CMT
Appts & Staffing Committee

Action

Communications

Consultative Group
Corporate Approval
Council Approval

Minor Change

Communications
TULG
Director

Submission
Consultative Group
Delegated Approval

Document Review Plans

This policy/ procedure will be reviewed on a 3 yearly basis unless it has:

- A monetary value included within it, in which case an annual review will be required, and/ or
- A legislative change is required as directed by government.

Distribution

The document will be distributed through Astute and will also be available on the Intranet and paper based copies.

Security Classification

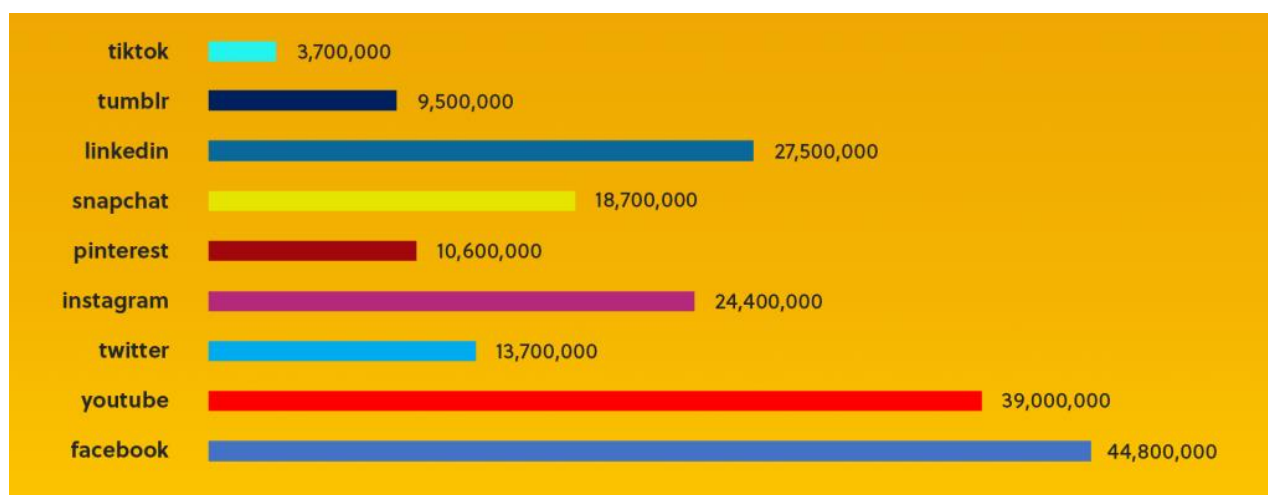
This document is classified as SEC 1 Routine with access restricted to Tamworth Borough Council Staff and business partners.

1. Introduction

Social media is the term commonly given to online tools, channels and interactive media which allow people to interact with individuals, groups or organisations by sharing information, opinions, knowledge, interests and asking questions or participating in online discussion.

Social media includes a range of channels - such as Facebook, Twitter, LinkedIn, Flickr, YouTube, Instagram, TikTok, blogs and forums – which are gradually replacing traditional media and mass communication methods.

According to Ofcom's 2021 Online Nation Report, 94% of UK homes have internet access and 93% of adults are online, and this is almost universal among those under 55 (96% of 45-54s, increasing to 98% of 16-24s.) The report also states that the average time spent online is 3 hours 37 minutes a day and more than eight in ten adults in the UK who go online (82%) have a social media profile, such as a Facebook or Twitter account. According to Facebook's own statistics there are 60,000 people (aged 18+) on the platform within a 1 mile radius of Tamworth.



UK users on social media (Source: Revive.digital - April 2020) See Appendix 1 for breakdowns of social media usage by channel and age.

These tools present opportunities and challenges for Tamworth Borough Council. Social media allows us to respond to news and views and also encourage people to get involved. We no longer have to wait to be asked for an opinion by the print media – we can generate our own content and place ourselves as a key commentator on Tamworth, sharing interesting and relevant material. It can assist us to communicate more widely and help reach groups in ways the authority has not done so before. It provides an opportunity to create a wider awareness of who we are and what we do, reach and interact with our target audiences, drive people to our websites and aid digital transformation.

Social media should not be seen as a special set of tools which needs a dedicated strategy. It is a 'business as usual' tool which should form part of every campaign strategy, where it is relevant to the target audience.

Council social media accounts will only be authorised by the Council's Communications and Marketing Manager with approval from the relevant Assistant Director.

Currently Tamworth Borough Council has four corporate social media channels:

1. Facebook - www.facebook.com/TamworthBoroughCouncil
2. Twitter – <https://twitter.com/tamworthcouncil>
3. YouTube - www.youtube.com/user/TamworthCouncil
4. LinkedIn - www.linkedin.com/company/tamworth-borough-council

We also run channels for TBC-operated venues such as the Castle, TIC (Visit Tamworth), Enterprise Centre and Assembly Rooms. The primary purpose of these channels is promotion of the events and services offered at these venues. A full list of channels and authorised users is maintained by the Communications & Marketing Team.

This document provides comprehensive guidance around the standards expected in relation to both work-related and personal use of social media.

Both internally and externally officers must be consistent in their social media behaviour, regardless of which part of the organisation it originates from. Social media needs to be joined up, rather than individual parts of the organisation acting in an uncoordinated way. To ensure we have consistency, our online presence will be managed and monitored by the Corporate Communications & Marketing team through a corporate social media management tool.

The purpose of this policy is to state the social media guidance for Tamworth Borough Council (TBC). This includes the corporate use of social media, and provides information on the expected behaviours of users on these and other sites. It also outlines the governance process around how social media sites will be set up to promote council services or the delivery of services, and how social media can be managed in a safe and responsible way.

The aim of this policy is:

- To preserve and protect the reputation of TBC and its employees
- To support the development of TBC's social media sites to promote customer engagement, promotion of council services, increase transparency, share key messages, and improve digital-based customer services
- To inform staff and other users about the acceptable use of social media in their professional capacity, ensuring the council is not brought into disrepute by affiliation with unsuitable sites or through comments posted onto public online forums.

2. Social Media and the Law

Libel and copyright laws exist on social networks in exactly the same way they do in traditional print media. There are a number of potential legal issues arising from the growing popularity of social media.

Due to the sharing nature of social networks, defamatory messages can reach large audiences very quickly and, once posted, can be shared by others, making the message hard to ever remove from the site entirely.

The Communications Act 2003 (section 127) states:

“It is illegal to send messages that are “grossly offensive or of an indecent, obscene or menacing character” or “for the purpose of causing annoyance, inconvenience or needless anxiety to another, persistently makes use of a public electronic communications network”.

An individual found guilty of an offence under this section could face a fine or prison sentence of up to six months. There have been cases of elected members being reported to the police for breaching this section.

Potential legal issues:

- **Libel** – If you publish an untrue statement about a person which is damaging to their reputation, they may consider it as defamatory and consider legal action. The same thing may happen if, for example, someone else publishes something defamatory on your social media profile; you know about it and don't take swift action to remove it. A successful legal claim could result in the award of damages against you.
- **Copyright** – Placing images or text on your site from a copyrighted source (for example extracts from publications or photos), without obtaining permission, is likely to breach copyright laws. Therefore don't publish anything you are unsure about, or obtain prior permission. Again, a successful claim for breach of copyright would be likely to lead to an award of damages against you.
- **Bias and Predetermination** – if you are involved in making planning, licensing or other quasi-judicial decisions, **do not** say anything through social media (or indeed anywhere) that suggests you have made your mind up on an issue that is due to be formally decided. While your likely view on a particular application may be well known, you need to be able to show that you attended the committee or hearing prepared to take on board and weigh all the evidence, and were genuinely persuadable to a different view, otherwise, the decision may be later challenged as invalid. If a person has suffered some sort of detriment as a result of such an invalid decision, they may have a claim against the council for damages.
- **Obscene material** - It goes without saying that you should avoid publishing anything that people would consider obscene. Publication of obscene material is a criminal offence.

Criminal Offences

Don't panic! These generally apply to day to day life, but it is worth considering them as they impact the use of social media too:

- **Harassment** - It is a criminal offence to repeatedly pursue a campaign against someone where this is likely to cause alarm, harassment nuisance or distress.
- **Data Protection / General Data Protection Regulation (GDPR)**. - It is illegal to publish personal data about individuals unless they have given you their consent. This might apply to your constituents or service users. As an elected member or officer you are a data controller in your own right and therefore personally responsible for what you publish. Make sure you understand the requirements of the GDPR and Data Protection Act. Contact the Information Governance Manager for more information.
- **Incitement** - It is a criminal offence to incite any criminal act.

3. Personal Use of Social Media

Employees and members are encouraged to use social media. However, as a Tamworth Borough Council employee or elected member, there are considerations to take into account.

In some respects, engagement through social media is no different to engagement through traditional channels or even talking to someone face to face. The same conventions and codes of conduct apply in terms of how you represent yourself and the council. At all times - in or out of working hours - you are an ambassador for the council. Be aware that your actions captured via images, posts or comments online can reflect on the organisation. Personal digital activity could have an adverse impact on the employee's professional role, council's image and reputation.

Employees are required to always act in accordance with the [Acceptable Use Policy](#) and the [Code of Conduct Policy](#), of particular note is section 5:

5.4 Employees should not bring the council into disrepute by placing on record personal opinions about the council; recording footage not conducive with council business whilst on the premises or engaged in council business on social media sites. Employees are urged to be cautious when using social media sites and understand that anything posted on such sites are available to a wide audience and will reflect on the Council, even if they are your personal views. Care should be taken to ensure any comments should not undermine your position as a professional, trusted and responsible person. Employees should be aware that any disrespectful comments - including bullying and harassment will be dealt with under our Capability and Conduct Policy and may result in disciplinary action.

Remember:

- If your personal profile discloses you work for Tamworth Borough Council, you and your views could be seen as being representative of TBC. Even though you are acting in your own personal capacity, you are on show to your friends and anyone else who sees what you write. You should make clear that the views expressed are personal, and not those of the council.
- Even though social media is considered informal, don't criticise your colleagues, council decisions or reveal confidential TBC information. Breach of confidentiality could result in disciplinary action.
- You should make sure that others cannot access any content, media or information from that profile that (a) you are not happy for them to have access to; and (b) which would undermine your position as a professional, trusted and responsible person.
- Council logos and trademarks may not be used without written consent.
- Ensure you are always respectful towards employees, customers, members, suppliers etc. Employees should be aware that any disrespectful comments - including bullying and harassment – could be seen as libellous and could result in disciplinary action under the council's Conduct and Capability policy.
- You must not disclose politically sensitive information. Politically sensitive information may relate to matters that are being considered or debated, or are due to be considered or debated by the Council or Cabinet or one or more of the Council's committees.

As a basic rule, if you are not happy for others you work with to see particular comments, media or information simply do not post it in a public forum online.

Recommendations:

- Check the privacy settings on your profile so that only people you have accepted as friends can see your content.
- Review who is on your 'friends list' on your personal profile. In most situations you should not accept friend requests on your personal profile from 'clients' you work with (This includes young people, parents, organisations etc.)
- You must consider carefully 'friends requests' from service users, their families or friends or others e.g. contractors, elected members and accept them only if you are quite sure this will not put you in a position of having a real or apparent conflict of interest as a council employee.
- Ensure personal blogs have clear disclaimers that the views expressed are yours and do not represent the views of the organisation. Make it clear that you are speaking for yourself and not on behalf of Tamworth Borough Council.
- The Council will not tolerate any of the following in relation to social media posting:
 - abusive or threatening behaviour
 - inappropriate comments or material that may be regarded as discriminatory
 - inciting or supporting somebody to commit a crime. This can include sharing content originated by others as this could be regarded as tacit approval of that content.

While on the Council network, the ICT service monitor the use of social media and websites in relation to any access of excessive or inappropriate content and ensure that any appropriate blocking or filtering of access is applied.

4. Guidance for Employees Posting on behalf of TBC

This section covers additional advice specifically for staff that post on Tamworth Borough Council channels.

The Council's Communications and Marketing Team will co-ordinate Council-wide social media accounts on the most relevant social media sites. This includes providing access to services to deal directly with customer contact and/or other communications messages where there is a valid business case for services to do so. Where appropriate, other team members will be permitted limited access.

All social media channels will be checked on a daily basis and responded to in a timely manner by the Communications and Customer Services Team. Corporate channels are currently monitored five days a week during office hours. Where possible, posts should be coordinated through the social media management software (AgoraPulse.) This saves time by allowing posts across multiple channels at once, tracks usage and allows for timely scheduling of posts to take advantage of peak user viewing times that may be outside of office hours.

Principles

The Council will use social media in a safe, appropriate and purposeful way to inform and engage with the public, stakeholders, the media and employees in support of the Council's strategic vision and priorities.

The Council will abide by any relevant or applicable laws, terms, and conditions, so that the Council is not exposed to risks. Use of social media sites will at all times be consistent with the Council's duty to safeguard children, young people and vulnerable adults, in accordance with relevant statutory requirements and service specific protocols. Employees must act in accordance with the law and be aware of the risk of legal action against them individually and the Council as employer if social media is used inappropriately - including breaching any standards outlined in this guidance.

What to bear in mind when posting:

Tone of voice – should be human and written in plain English, and where possible in line with our vision. Celebratory news will be done in a natural and friendly way.

Criticism - We will not get into an argument but will seek to correct people if they portray us unfairly. We should respond as we would do to criticism received via any other method. However, we do not have to endure online abuse on our own channels. Filters are in place to limit this on Facebook. **Please refer to Appendix 2 for guidelines on how to handle negative comments.**

Be clear upon expectations and limitations - If it is going to take a few hours or a few days to get the answer to a question, be honest and say so. Keep the customer informed throughout the time period. Users of social media expect an answer within hours, not days. If this isn't possible we should tell them so, and explain why.

Political neutrality - During the course of their work, employees using social media sites for business purposes must maintain political neutrality and not indicate individual political opinions. In addition to this there are strict rules during Purdah; usually in the month running up to an election. Purdah is a prohibition on local authority publishing "any material which, in whole or in part, appears to be designed to affect public support for a political party"; so Councillors should not be quoted, pictured or their posts shared during this time.

Copyright - You must not breach copyright, for example by: using someone else's images or written content without permission or failing to give acknowledgement where permission has been given to reproduce something.

Discrimination - You should not do anything that could be considered discriminatory against, or bullying or harassment of, any individual.

You must not:

- make offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age.
- post images that are discriminatory or offensive or links to such content.
- criticise customers or colleagues or make defamatory comments about individuals or other organisations or groups

Channel shift - Where possible, signpost users to the relevant place for information. To encourage channel shift, signposting should be to online methods first such as our website rather than to a telephone number.

GDPR/Data Protection - You must always treat ALL information that is posted into ANY Social Media service as being in the public domain (including apparently 'closed' or 'restricted' groups). No personal data should be posted to ANY social media channel. Be aware when replying to posts whether your answers might contain personally identifiable information, whether for yourself or for others. You must not post confidential information about an individual (such as a colleague or customer contact) or organisation. If in doubt consult the [Information Security Policy](#) for further advice. Similarly, no commercially sensitive data should ever be posted.

Procedures

Complaints/reports – As we are promoting channel shift, complaints and 'report it' issues from customers should be signposted to the official digital channels wherever possible, either the online form on our website or to email enquiries@tamworth.gov.uk so that they can be logged as per all other requests. If this is not possible, the details should be emailed to Customer Services enquiries@tamworth.gov.uk by the officer.

Compliments – These should also be emailed to Customer Services enquiries@tamworth.gov.uk so they can be logged.

Freedom of Information requests - can be accepted via social media channels. However they must meet the criteria of Section 8 of the Act. Requirements in brief must: be in writing; state the name of the requester and provide an address for correspondence; and describe the information being requested. If we are signposting, as advised to Customer Services, a record still be kept due to the right to request an internal review. Requests can be emailed to our Data Protection Officer: FreedomofInformation@tamworth.gov.uk

Key actions

Employees are responsible for upholding this guidance and should ensure that they take the time to read and understand it. Any misuse of social media must be reported promptly to the employee's line manager.

Line managers will ensure that their employees are aware of this guidance (and all other relevant policies and guidance related to the professional and personal use of social and streaming media). Line managers are responsible for ensuring that their employees act in accordance with requirements.

Mistakes do happen – if you post something you didn't mean to, or get a message or response wrong, employees should advise their line manager and the Communication and Marketing Team immediately to agree remedial action and minimise embarrassment and reputational damage.

Electronic communication which is intimidating or threatening commonly known as Cyber bullying will not be tolerated.

If any employee is found to have breached this guidance, they may be subject to the Council's Conduct and Capability procedure.

The Council's Human Resources (HR) team will maintain relevant HR policies and guidance to ensure individual access to social and streaming media from Council devices is appropriate to official duties. It will also provide advice to managers on any individual performance or conduct issues relating to the appropriate use of social media.

Communications in a crisis

Procedures are in place for communicating in a crisis. Please refer to the Emergency Planning documentation.

Monitoring

Quarterly key performance indicators have been established for the main social media channels. These are analysed on an annual basis by the Communications and Marketing Team for channel success, audience suitability and for future recommendations. Messages, comments, mentions and responses are monitored and logged through our Social Media Management tool (AgoraPulse) Reports for individual channels can be run off at any time. The most effective posts and times to post are also generated through these reports and help us to identify key areas of improvement for future campaigns. These are reviewed after any major campaign and on an annual basis alongside the KPIs.

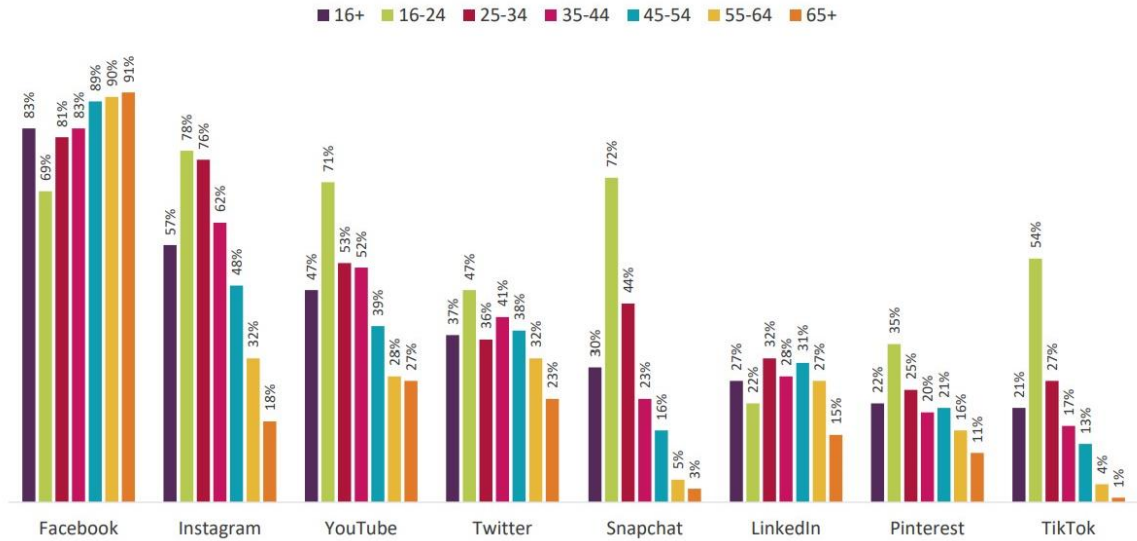
5. Guidance for Employees using Social Media for Research & Investigations

The use of social media and internet research to obtain information to assist with regulatory and enforcement functions is covered by the Regulation of Investigatory Powers Act 2020 Policy and must be referred to prior to carrying out such activity.

Appendices

Appendix 1 – social media account usage, UK

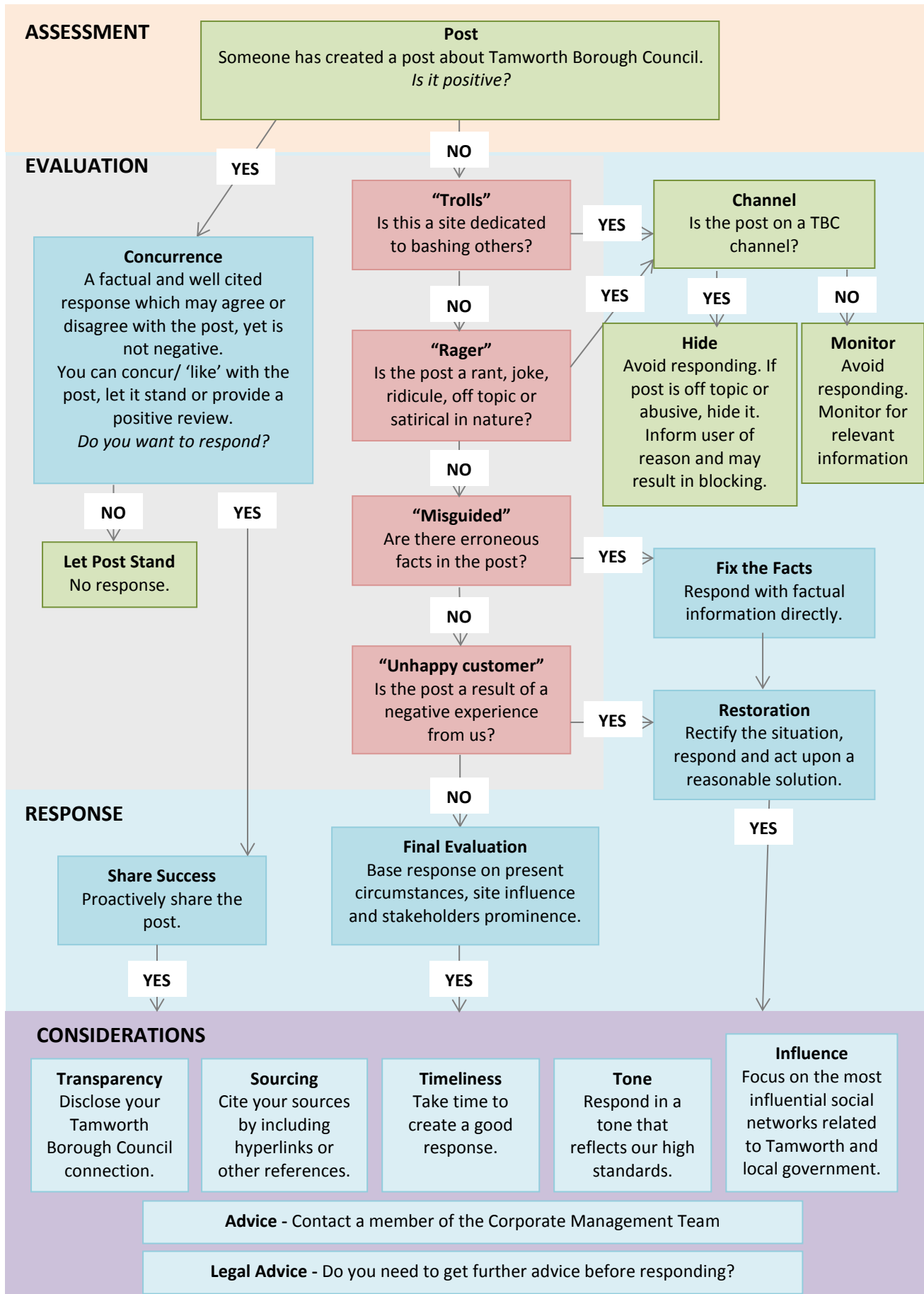
Use of social media sites in 2020 (Source: Ofcom report June 2021)



Media use by age (Source: Ofcom Media use report April 2021)



Appendix 2 – Guidelines on how to assess and respond to social media posts



Appendix3 – Glossary of Terms

Archive - An archive may refer to topics from an online discussion that has been closed but saved for later reference. On blogs, archives are collections of earlier items usually organised by week or month. You may still be able to comment on archived items.

App - Popularized in the general lexicon by the iPhone, an app is simply an application that performs a specific function on your computer or handheld device. Apps run the gamut from Web browsers and games to specialized programs like digital recorders, online chat or music players.

Alerts – Tool to get a search engine to tell you whenever a new page is published on the web which includes your specific keyword.

Blog – Editorless web publishing tool. E.g. WordPress, Blogger, MovableType

Blogsphere – General term for all the blogs on the internet.

Blog roll – List of recommended blogs.

Cloud computing - Internet-based computing whereby shared resources, software and information are provided to computers and other devices on-demand, like the electricity grid. Crucially, private files are stored off the owner's terminal – so they can be accessed anywhere in the world.

Cyberspace - Widely used as a general term for the Internet or World Wide Web. More recently blogsphere has emerged as a term for interconnected blogs.

Facebook - An example of social networking.

Flickr - Photo sharing site.

Follower – A user who has chosen to subscribe to your content, e.g. on Twitter.

Friend List – A user's personal sub-categorisation of friends on a social network eg. Co-workers, Current Friends, Clients, Old Friends.

Hashtag - Invented by HubTag and popularised by Twitter, a hashtag enables users to find all the tweets linked to a topic when they use a Twitter search engine such as Twitter Search. For example, the hashtag: #leadersdebate was used to see what people were saying on Twitter about the General Election 2010.

Instagram - A platform for sharing photos and videos.

Instant messaging / IM - chat with one other person. Using an IM tool like AOL Instant Messenger, Microsoft Live Messenger or Yahoo Messenger. The tools allow you to indicate whether or not you are available for a chat, and if so can be a good alternative to emails for a rapid exchange. Problems arise when people in a group are using different IM tools that don't connect. One way around this is to use a tool like Skype that also provides IM.

"Like" - a way to give positive feedback or to connect with things you care about on Facebook. You can like content that your friends post to give them feedback or like a Page that you want to connect with on Facebook. You can also connect to content and Pages through social plugins or advertisements on and off Facebook.

Microblog - Short blog e.g. Twitter using a maximum of 140 characters.

Online means being connected to the Internet, and also being there in the sense of reading or producing content. Offline means not online, that is, not connected to the Internet. It may refer to an unconnected computer, or activities taking place without the benefit (or perhaps distraction) of a connection.

Offline means not online, that is, not connected to the Internet. It may refer to an unconnected computer, or activities taking place without the benefit (or perhaps distraction) of a connection.

Page – (aka Brand Page, Fan Page) – the anthropomorphic representation of a brand within a social network. E.g. Nutella Fan Page. This works both ways and can be the brand representation of a person within a social network – e.g. Michael Phelps fan page, British Cycling (www.becomeafan.com/cycling)

Pinterest - A virtual pinboard for creating and sharing images.

Retweeting is an integral part of the Twitter experience. The retweet (or “RT”) allows Twitter users to share the best links, tweets, and gems they find from others using the service.

RSS is short for Really Simple Syndication. This allows you to subscribe to content on blogs and other social media and have it delivered to you through a feed.

Snapchat - A photo messaging application for photos, videos, drawings and text

Spam - Electronic junk mail

Status is a description of what a user is doing right now. E.g. James is eating dinner.

Tags are keywords attached to a blog post, bookmark, photo or other item of content so you and others can find them easily through searches and aggregation. Tags can usually be freely chosen - and so form part of a folksonomy - while categories are predetermined and are part of a taxonomy.

Threads are strands of conversation. On an email list or web forum they will be defined by messages that use the use the same subject. On blogs they are less clearly defined, but emerge through comments and trackbacks.

TikTok is a social network for sharing user-generated videos.

Trending - Current popular people or conversations as in trending on Twitter now...

Troll - Someone who disrupts online communities or discussions through unhelpful or irrelevant posts.

Tweet - A message sent on Twitter.

Twitter - An example of microblogging.

Vimeo - A platform for sharing videos and photographs.

Vlogger – A video platform blogger – e.g. on YouTube.

Wall – shared discussion board specifically about an individual and displayed on the individual profile.

Wiki - A tool which enables anyone to add or edit content on a website.

Wikipedia - Online encyclopaedia which works using this method and is therefore not always accurate.

Yammer, Inc. is an enterprise social network service that was launched in September 2008. Unlike Twitter, which is used for broadcasting messages to the public, Yammer is used for private communication within organizations or between organizational members and pre-designated groups.

You Tube - A platform for sharing videos and photographs.

Useful links:

Twitter - Sign on to Twitter here: <https://twitter.com/>

Guide to getting started with Twitter: <https://help.twitter.com/en/twitter-guide>

Facebook - Sign up to Facebook here: <https://en-gb.facebook.com/>

Beginner's guide: <https://www.facebook.com/help/570785306433644>

Instagram - How to create an Instagram account: <https://help.instagram.com/1642053262784201>



Tamworth
Borough Council

Community Impact Assessment

Part 1 – Details		
What Policy/ Procedure/ Strategy/Project/Service is being assessed?	Social Media for Employees	
Date Conducted	July 2021	
Name of Lead Officer and Service Area	Linda Ram Corporate Communications	
Commissioning Team (if applicable)	N/A	
Director Responsible for project/service area	Anica Goodwin	
Who are the main stakeholders	Employees	
Describe what consultation has been undertaken. Who was involved and what was the outcome	CMT TULG Members	
Outline the wider research that has taken place (E.G. commissioners, partners, other providers etc.)		
What are you assessing? Indicate with an 'x' which applies	A decision to review or change a service	<input type="checkbox"/>
	A Strategy/Policy/Procedure	<input checked="" type="checkbox"/>
	A function, service or project	<input type="checkbox"/>
What kind of assessment is it? Indicate with an 'x'	New	<input checked="" type="checkbox"/>
	Existing	<input type="checkbox"/>

which applies	Being reviewed	<input type="checkbox"/>
	Being reviewed as a result of budget constraints / End of Contract	<input type="checkbox"/>

Part 2 – Summary of Assessment

Give a summary of your proposal and set out the aims/ objectives/ purposes/ and outcomes of the area you are impact assessing.
 The Social Media policy is intended to provide clear guidance regarding the acceptable use of social media by employees both within and outside of work.

Who will be affected and how?
 All employees and contractors temporary and permanent - This policy provides guidance on the use of Social Media.

Are there any other functions, policies or services linked to this impact assessment?
 Yes No

If you answered 'Yes', please indicate what they are?
 All employees
 Dignity and Respect policy
 Capability and Conduct policy
 Acceptable Use Policy
 Harassment, Assault and Threats Policy
 Regulation of Investigatory Powers Act 2020 Policy

Part 3 – Impact on the Community
 Thinking about each of the Areas below, does or could the Policy function, or service have a direct impact on them?

Impact Area	Yes	No	Reason (provide brief explanation)
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The policy applies consistent and fair treatment irrespective of age. However it is recognised that the different age groups utilise social media in varying proportions
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The policy applies consistent and fair treatment irrespective of disability. Social Media sites have assistive technologies built in to make them accessible to

			disabled people
Gender Reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The policy applies consistent and fair treatment irrespective of gender reassignment
Marriage & Civil Partnership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The policy applies consistent and fair treatment irrespective of marital status
Pregnancy & Maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The policy applies consistent and fair treatment irrespective of pregnancy and maternity
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The policy applies consistent and fair treatment irrespective of race
Religion or belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The policy applies consistent and fair treatment irrespective of religion or belief and explicitly references adjustments for religious observance
Sexual orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The policy applies consistent and fair treatment irrespective of sexual orientation
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The policy applies consistent and fair treatment irrespective of sex
Gypsy/Travelling Community	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not a factor
Those with Caring/Dependent responsibilities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The policy applies consistent and fair treatment irrespective of those with caring responsibilities
Those having an offending past	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not a factor
Children	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not a factor
Vulnerable Adults	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not a factor
Families	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not a factor
Those who are homeless	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not a factor
Those on low income	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not a factor
Those with Drug or Alcohol problems	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not a factor
Those with Mental Health issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not a factor
Those with Physical Health issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not a factor
Other (Please Detail)	<input type="checkbox"/>	<input type="checkbox"/>	

Part 4 – Risk Assessment

From evidence given from previous question, please detail what measures or changes will be put in place to mitigate adverse implications

Impact Area	Details of the Impact	Action to reduce risk
All areas	The policy is explicit that any form of discrimination will be dealt with under the Capability and Conduct Policy	Regular equality training and 3 yearly review of the Social Media Policy which will then be cascaded to staff.
Age	It is recognised that different proportions of age profiles access social media	Ensure that a variety of communication channels are used to

Part 5 - Action Plan and Review

Detail in the plan below, actions that you have identified in your CIA, which will eliminate discrimination, advance equality of opportunity and/or foster good relations.

If you are unable to eliminate or reduce negative impact on any of the impact areas, you should explain why

Impact (positive or negative) identified	Action	Person(s) responsible	Target date	Required outcome
n/a				

Date of Review (If applicable)