



COMMUNICATIONS AND ENGAGEMENT

SOCIAL MEDIA POLICY

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STRATEGIC PLANNING, PERFORMANCE AND COMMUNICATIONS

COMMUNICATIONS AND ENGAGEMENT

SOCIAL MEDIA POLICY

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1. POLICY STATEMENT

Social media is a key channel for the Scottish Fire and Rescue Service (SFRS) to communicate and engage with the public, partners and key stakeholders.

SFRS has a number of official corporate social media profiles which are managed by the Communications and Engagement team. There are also a large number of area, station, departmental, individual and other SFRS accounts present on various social media platforms with clear and explicit links to the organisation which are classed as official affiliate accounts.

In addition, many staff use social media in a personal capacity and it is therefore essential that SFRS has a robust Social Media Policy to protect the organisation and individual users from risk.

2. PURPOSE

The purpose of this policy is to ensure all staff are aware and informed of the appropriate use of social media, both in a work and personal capacity, and to minimise reputational risk to the organisation and individual users. All staff are reminded that social media is a public platform – even spaces that may appear closed or private – and of the importance of communicating in a responsible and professional manner.

All staff must ensure they adhere to the guidelines outlined in this policy when using social media in a professional or personal capacity. Failure to do so may incur reputational risk to the organisation and the possibility of disciplinary action, or in extreme cases criminal or civil proceedings.

3. SCOPE

This policy is applicable to all SFRS employees, including volunteers, temporary staff, agency workers and those on secondment to the Service or SFRS staff seconded to another organisation.

Social media includes but is not limited to Facebook, Twitter, Instagram, TikTok, LinkedIn, YouTube, Snapchat, Reddit, any blogging site or self-publishing site and can include comment sections on websites. It further extends to instant messaging platforms such as WhatsApp, Yammer, Facebook Messenger and any new or emerging social media platforms. It applies to the use of social media for business purposes, as well as personal use that may affect the organisation in any way.

In addition, it covers the appropriate use of social media and instant messaging applications in a personal capacity in line with relevant SFRS policies and procedures.

This policy does not form part of any employee's contract of employment and may be amended at any time. Any changes will be consulted upon and communicated to staff prior to becoming active.

4. ROLES AND RESPONSIBILITIES

The **Head of Communications and Engagement** has overall responsibility for the development of this policy and ensuring arrangements are in place to support its implementation.

The **Communications Managers** and **Communications Team Leaders** have day-to-day responsibility for the management and implementation of this policy, the management and administration of official SFRS social media profiles and ensuring corporate profiles and content are relevant, accurate and up to date.

Communications Officers have day-to-day responsibility for updating and monitoring the content of official SFRS social media sites, ensuring information is current, accurate and up-to-date and appropriate responses are provided in a professional and timely manner.

Line managers have the responsibility for ensuring awareness of this policy among employees for whom they are responsible and for ensuring that staff familiarise

themselves with the policy, understand it and adhere to the standards and guidelines herein. This is particularly important where one or more employees are responsible for the administration and management of official affiliated accounts such as an area, station or departmental profile.

Official affiliate account owners have the responsibility for familiarising themselves with and adhering to this policy in the administration and management of official affiliate accounts.

Individual employees have the responsibility for familiarising themselves with and ensuring they comply with this policy. Inappropriate use of social media in a personal capacity could still breach this policy.

5. CORPORATE AND AFFILIATE ACCOUNTS

National corporate accounts

The Communications and Engagement function retain overall responsibility for the creation, maintenance and management of the official SFRS national corporate social media accounts.

The national corporate accounts are used to communicate SFRS messaging, updates and values to the public, partners and stakeholders, supplemented by official affiliate accounts as detailed below.

Staff who manage the national corporate accounts must ensure that login details, such as usernames and passwords, are stored securely and adhere to the Acceptable Use Policy.

Only members of the Communications and Engagement team will have access to SFRS national corporate accounts. For any requests to publish or share content across the national corporate accounts, please contact:

SFRS.Communications@firescotland.gov.uk

Official affiliate accounts

The below applies to those who operate existing SFRS official affiliate accounts or those who may consider creating an account in the future.

Official affiliated accounts are defined as social media accounts which are managed by a staff member outside of the Communications and Engagement function with clear affiliation to SFRS.

They are split into two categories:

- **Department affiliate** – SFRS area, station, function and any other non-human profile with clear and distinct SFRS affiliation, where all views and opinions explicitly represent the organisation;
- **Staff affiliate** – Staff account which exists solely for the purpose of SFRS business, clearly identifiable as SFRS affiliate, where all views and opinions explicitly represent the organisation.

These accounts fall under the ownership of SFRS and all views expressed therefore represent that of the organisation.

Failure to manage social media channels correctly has the potential to damage our reputation. Poor management or understanding of social media tools can lead to employees posting improper or incorrect information on social media sites.

This does not apply to personal accounts owned and operated by employees with a link to SFRS but are clearly identified as personal accounts. These are covered in [Section 6](#).

Passwords and access

Staff who manage existing official affiliate accounts must ensure that login details such as usernames and passwords are stored securely and adhere to the Acceptable Use Policy.

More than one staff member should be able to access any official affiliate account and it is the responsibility of the respective line management to ensure appropriate governance.

SFRS reserves the right to request that login details for official affiliate accounts, such as usernames and passwords, are securely shared for business-critical purposes, such as issues of reputational sensitivity or major incident. This request will be made to and managed by respective line management and any information would be stored securely as per the Acceptable Use Policy.

Creating a new official affiliate account

Department affiliate

Any staff member or department who seeks to establish and operate an official affiliate account must seek express permission from their line manager, in the first instance, followed by the Communications and Engagement function. If given initial permission following engagement with respective line management, please email the Communications and Engagement function for a final decision at SFRS.Communications@firescotland.gov.uk and the following will be considered:

- **Purpose** – What is the purpose and aim of this account? Who will this account aim to communicate with and is social media the appropriate channel? What kind of content will be issued on the channel?
- **Existing accounts** – Is there an existing and active account with an aligned remit and audience that could fulfil this purpose?

- **Access** – If granted, who will have access and are they aware of the relevant policies and procedures?

Applications will be considered and a final decision taken by Communications and Engagement senior management based on the above criteria and adherence to this policy.

Staff affiliate

This type of account would generally apply but is not limited to the Chief Officers, Deputy Chief Officers, Assistant Chief Officers, Directors, SFRS Board Members, senior rank officers and heads of function. These accounts are solely for business purposes and any views or opinions expressed clearly represent that of the organisation. They are not used in any personal capacity. Any employee who seeks to create a new or adjust an existing account to be classed as a staff affiliate, please contact the Communications and Engagement function.

Non-affiliated accounts with SFRS link

This applies to employees who operate social media accounts with a clear link to SFRS – such as a personal Twitter or Facebook page that state you work for the Scottish Fire and Rescue Service or features SFRS branding. Employees must always state a disclaimer clarifying that their views do not represent those of their employer.

Ownership and responsibility

The table below outlines the structure of account ownership and responsibility applicable to official corporate, affiliate and other personal social media accounts:

Account classification	Ownership	Responsibility	Access for business-critical purposes
SFRS national corporate accounts	SFRS	Communications and Engagement	Communications and Engagement
Department affiliate (such as area, station, function, other)	SFRS	Respective area or departmental management	Respective area or departmental management; Communications and Engagement upon request
Staff affiliate (SFRS employee / board member, representing views of SFRS, non-personal)	SFRS	Respective employee, board member or relevant business support team as directed	Respective staff member or business support team; Communications and Engagement upon request
Personal (with clear link to SFRS)	Respective staff member	Respective staff member	N/A
Personal (with no clear link to SFRS)	Respective staff member	Respective staff member	N/A

6. PERSONAL USE

Social media is a popular and convenient way to stay in touch with friends and family and to keep updated with news, current affairs and specific interests. While there is no intention to restrict any proper and sensible exercise of any employee's rights and freedoms, all staff are expected to conduct themselves in an appropriate manner.

Staff should conduct themselves in such a way as to avoid bringing the organisation into disrepute or compromising its reputation, effectiveness or the security of its operations and assets. If you post, share, like or endorse content which could bring the organisation into disrepute, then you could be subject to action under the Disciplinary Policy and Procedure or, in extreme cases, civil or criminal proceedings.

It is also recognised that some staff use social media in a personal capacity with a clear association to SFRS through a declaration of employment or in a biography, photography, content and branding. This would be classed as a personal account which identifies that you are employed by SFRS. Employees must be aware that they represent the organisation online as much as they would in a public space and are expected to conduct themselves accordingly.

Staff who clearly state their affiliation with SFRS on any social media profile or in any social media postings must also state in their profile that their views do not represent those of their employer (unless they are authorised to speak on behalf of SFRS via a recognised affiliate account, as outlined in [Section 5](#)).

However, staff are also reminded that using a disclaimer will not protect an employee from disciplinary action should their online activities be found to be inappropriate under the standards and guidelines outlined in this document, or which breaches Our Values and Code of Conduct.

Instant Messaging

Instant messaging apps – this includes but is not limited to WhatsApp and Facebook Messenger – are classed as social media and employees must therefore be aware that posts can be shared outside of their network.

All staff should therefore be aware that, as an employee of SFRS, they must not post anything that may bring the organisation into disrepute, or that could cause distress or offence to fellow colleagues or members of the public through their use of such sites.

The use of instant messaging apps should be carried out with the same level of precaution as that of creating and sending emails. Staff must exercise caution to avoid:

- Distributing unlawful, offensive or inappropriate material for which the Service would be held responsible and could be prosecuted;
- Unauthorised transmission to a third party of sensitive information concerning the activities of SFRS;
- Transmission of material such that this infringes the copyright of another person, including intellectual property rights;
- Transmission of obscene, offensive or indecent images or data;
- Creation or transmission of material that discriminates or encourages discrimination on social, ethnic, gender, sexual orientation, marital status, disability and religious or political beliefs;
- Creation or transmission of defamatory material that includes claims of a deceptive nature;
- Transmission of any message that could bring SFRS into disrepute.

If SFRS receives a complaint about inappropriate communications on instant messaging apps, it will be investigated promptly. If the complaint is found to be well-founded, SFRS will consider whether there are sufficient grounds to commence a formal disciplinary process, as per the Disciplinary Policy and Procedure.

7. BEST PRACTICE

Use and Standards

It is essential that content shared on official corporate and affiliate accounts is consistent with SFRS's corporate image, aims and objectives.

Social media should be used to promote SFRS values, aims and objectives in a positive, appropriate and purposeful way to engage and inform users.

Communications and Engagement will continue to stay informed of current social media trends to ensure the most effective online communication methods are utilised to their full potential and that content shared is as accessible and inclusive as possible for all audiences.

There is a risk to all staff from the misuse of any social media sites. Inappropriate content or posts may pose a reputational risk to the organisation, give grounds for complaint to and/or disciplinary action, or potential civil or criminal charges. If in any doubt, please contact Communications and Engagement to seek appropriate guidance.

SFRS will not accept discriminatory, hateful or offensive comments or behaviour on any corporate or affiliate social media platform. Appropriate action will be taken to remove, report and block users who behave in a manner that breach this policy.

Social Media, Data Protection and the Law

Employees should never share confidential or officially sensitive information or documentation on any social media platform. This includes 'closed' or private instant messaging platforms, such as WhatsApp and Facebook Messenger.

Employees must not divulge any confidential or personal information or information belonging to SFRS, any SFRS partners, suppliers or stakeholders or members of the public that is not already in the public domain or expand upon such information already publicly available.

Never share specific details or images of an incident that may identify the cause, individuals or casualties involved or which may generally bring SFRS or its partners into disrepute. Such images can also cause upset for those involved. Images from within the cordon of a live incident ground should only be shared following direct engagement and agreement between Communications and Engagement and the respective officer in charge.

Employees are encouraged to share images from community and partnership events. However, staff must ensure that any images are both professional and appropriate in line with SFRS values. Staff should ensure that PPE, appliances equipment and any other related items should be correct and in appropriate condition.

In addition, appropriate permissions must be obtained from anyone who features or can be identified via visual content. These forms are available on iHub via the following links:

Media Images / Video Consent Form – Adult Member of the Public

Media Images / Video Consent Form – Child Member of the Public

Media Images / Video Consent Form – Employee

Copyright laws still apply online and, if you use or share copyrighted content such as images, video or audio without appropriate permissions, license or credit, then a claim could potentially be made against the organisation or you as an individual for copyright infringement.

Staff should also be conscious of sharing social or political opinions on any social media profile which explicitly links to SFRS. If a member of staff is sharing social or political opinions on a personal social media profile, then they must explicitly state that views are personal and do not reflect that of their employer. In addition, any employee giving a personal opinion as an experienced person in a particular field must also state that it is solely their views and not that of SFRS.

Anyone who posts on social media can be deemed a publisher under The [Defamation and Malicious Publication \(Scotland\) Act 2021](#). This not only covers the original author, but extends to anyone who likes, retweets or shares harmful words. Staff should not author, share, retweet or like anything which may cause harm to an individual, organisation or business' reputation, as this can result in legal action against the individual and incur serious reputational harm for the service.

Bullying, Harassment and Misconduct

Employees must not use social media channels to raise or discuss any work-related grievances. All employees should pursue work related grievances via the official Grievance Policy and Procedure.

Employees must not bully, or appear to bully or harass, any SFRS employee or any other individual or post anything which may cause distress or offence on social media.

It is unacceptable for employees to share offensive, obscene, harmful, abusive or inappropriate content received through social media, including within closed, private groups or employee groups which are also subject to our standards. This does not apply where an employee is sharing content with a line manager to inform and allow the Service to take appropriate action where a breach of the policy is believed to have occurred.

Staff should exercise caution and be careful to avoid, either consciously or inadvertently, 'liking', 'favouriting', 'following' or engaging with any sites that could be perceived to be posting inappropriate comments of the nature above which could bring the organisation into disrepute.

Staff should report, through formal SFRS mechanisms, any inappropriate content they receive or that is posted or shared by colleagues via social media, including where this is within a closed, private group or employee group, for appropriate action to be taken as soon as possible.

Staff must not engage in criticising, arguing or engaging in negative dialogue with colleagues, stakeholders, partners or the wider public on any social media platform.

SFRS policies

Staff are required to comply with all ICT policies and procedures on PC, tablet and smartphone usage, including policies which refer to accessing and operating social media platforms. Please refer to the Acceptable Use Policy for more information.

If approached by media or a journalist via a social media platform, you should immediately notify the SFRS Communications team as per the Engaging with the Media Policy.

Any employee absent from work should consider the appropriateness of social media posts which may be deemed to conflict with any aspect of the Attendance Management Policy.

Staff should always adhere to the Code of Conduct when using social media in a personal or professional capacity.

Content reproduction

Content shared on social media is permanent and open to being republished in other media. No organisation needs explicit permission to use or reproduce anything you post on social media.

Any photos or videos that are posted on social media can be used by that platform, e.g. by Facebook or Twitter for promotional purposes, as stated within their terms and conditions.

8. BREACH OF POLICY

Any breach of this policy will be taken very seriously and may result in disciplinary action after full investigation of the facts, if appropriate.

All staff should be aware that SFRS takes the posting of offensive material or the harassment, bullying or victimisation of its staff or the public via the internet and

social media sites during personal time as seriously as if it had occurred in the workplace.

Any member of staff who believes that they are being harassed, bullied or victimised as a result of another employee's posts on social media should make their line manager aware. Or if required, they should escalate to a more senior manager if appropriate.

9. COMPLIANCE

Indications of non-compliance with the provisions of this policy shall be investigated in accordance with the Code of Conduct.

SFRS reserves the right to:

- Request that content or posts considered to constitute a breach of this policy are immediately removed from social media;
- Request access to official affiliate accounts in business-critical matters such as issues of reputational sensitivity or major incident;
- Invoke the Disciplinary Policy and Procedure if any employee refuses to comply or whose actions are causing concern;
- Pass information to the relevant statutory authorities to consider criminal or civil prosecution.

The above list of sanctions is not exhaustive and individual circumstances will be taken into account, where appropriate.

10. ASSOCIATED DOCUMENTS / REFERENCES

Staff should always adhere to the:

Acceptable Use Policy

Attendance Management Policy

Brand Guidelines

Code of Conduct

Disciplinary Policy and Procedure

Engaging with the Media Policy

Grievance Policy and Procedure

Media Images / Video Consent Form – Adult Member of the Public

Media Images / Video Consent Form – Child Member of the Public

Media Images / Video Consent Form – Employee

Our Values

[Data Protection Act 2018](#)

[Defamation and Malicious Publication \(Scotland\) Act 2021](#)

If you require any assistance with this policy, please contact the Communications and Engagement team at SFRS.Communications@firescotland.gov.uk