



INTEGRITY IN PUBLIC LIFE

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# ADVICE ON THE USE OF SOCIAL MEDIA FOR MEMBERS OF DEVOLVED PUBLIC BODIES

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## 1. Introduction

1.1 Section 3 of the Model Code of Conduct for Members of Devolved Public Bodies concerns the general conduct expected in situations where an individual is acting as a member of a public body. Rules of good conduct in this section govern various matters including relationships with other Board Members and employees of the public body, confidentiality requirements and the use of the public body's facilities.

1.2 In particular, paragraph 3.13 of the Model Code of Conduct states:

*Members of public bodies must not misuse facilities, equipment, stationery, telephony, computer, information technology equipment and services, or use them for party political or campaigning activities. Use of such equipment and services etc. must be in accordance with the public body's policy and rules on their usage. Care must also be exercised when using social media networks not to compromise your position as a member of the public body.*

1.3 This advice is intended to assist members in complying with the provisions of the Model Code of Conduct when using social media.

1.4 Social media continues to evolve and, as such, this advice is not an exhaustive or definitive guide. It is intended to be a starting point to understanding issues relating to the use of social media.

## 2. General Advice

2.1 It is very important to note that the rules of good conduct set out in Section 3 must be observed in all situations where you are acting as a member, including representing the body on official business. You should be mindful that your perception of when you are carrying out official business and when you are acting privately may be different to the view of the public. Factors to consider include whether:

- you are representing the body or speaking on behalf of the body; whether you are readily identifiable as a member of your body in the situation / circumstances;
- you are using social media where you are identified as a member;
- your conduct could reasonably be regarded as bringing your position as a member, or your body, into disrepute; and
- you are engaged in activity, or commenting on matters that are within the scope of the body's functions.

2.2 You should always try to think ahead. If you have any concerns about a potential problem or conflict of interest, speak to the Standards Officer or Chief Executive so that advice can be sought and/or action can be taken before a situation becomes a serious problem or before a complaint is made about you.

### 3. Conduct on Social Media

3.1 The rules of good conduct may apply when you are engaging in media activity including the use of social media. As you will be aware, social media is a term used to describe on-line technologies, applications and practices that are used to share information, knowledge and opinions. The most well-known platforms include Facebook, Twitter, Instagram, YouTube and LinkedIn. The term social media can include, but is not limited to, social networking sites, blogs, wikis, content sharing sites, photo sharing sites, video sharing sites and customer feedback sites.

3.2 The conduct expected of you within a digital medium is no different to the conduct you should employ in other methods of communication, such as face to face meetings and written correspondence. Factors to consider when using social media include whether you:

- are identifiable as a member by directly referring to yourself as such or indirectly as such by referring to the body or through information or images posted;
- are using the body's equipment or your own when accessing or posting on social media platforms;
- have complied with the law including defamation, copyright, data protection, employment and equalities or harassment provisions;
- have complied with any Social Media, General Media, IT or Communications policy your body has produced;
- the information you are posting is confidential and you only have access to it because you are a member of the body;
- are demonstrating bias or pre-determination – do not express an opinion on a matter your body is yet to determine;
- have considered the immediate and permanent nature of the contribution you are about to make. Your comments are immediately available and may become more publicly shared than you intend.

3.3 Even if you are using social media in a private capacity, you should be aware that anything you post or put on your profile is a representation of you. Therefore you should not put anything online that you do not want to represent you. Remember standards of decency and the law apply.

3.4 You may also wish to think about:

- whether you are treating others with respect and consideration;
- whether 'liking' re-posting and re-tweeting comments or posts, or publishing links to other sites could be reasonably perceived in the circumstances as endorsing the original opinion, comment or information, including information on other sites;

- whether to allow disagreement on your social media pages;
- the tone can be harder to convey online so consider whether humour, irony and sarcasm be perceived as such;
- whether you have to respond. Sometimes people will say nasty things and people in public life can be singled out for abuse. If people criticising you have the wrong information, by all means talk to them. But if they are being sarcastic or downright abusive you should consider whether there is any value in engaging.
- whether anything you post could be considered obscene.

3.5 It is almost impossible to entirely delete anything that goes online. Even if you decided to delete something you have posted straightaway, there is always the possibility that someone has viewed, and even taken a screenshot of, the post in the meantime. What you post online will stay there and may potentially be shared with lots of other people, for both good and bad reasons.

#### 4. Other Resources

4.1 Other guidance that may be of interest or assistance includes:

- The Scottish Government’s Policy on social media, which can be accessed at [www.gov.scot/About/Information/Social-Media-Policies](http://www.gov.scot/About/Information/Social-Media-Policies);
- The UK Government’s Guidance for civil servants: [www.gov.uk/government/publications/social-media-guidance-for-civil-servants/social-media-guidance-for-civil-servants](http://www.gov.uk/government/publications/social-media-guidance-for-civil-servants/social-media-guidance-for-civil-servants) ;
- The Scottish Government’s On Board Guidance for Board Members of Public Bodies in Scotland (April 2015); [www.gov.scot/Publications/2015/04/9736](http://www.gov.scot/Publications/2015/04/9736)



Data control and version information				
Date	Action by	Version Updated	Current version	Brief Description
18/12/2015	LJ	N/A	V1.0	Introduction of Advice Note
24/03/21	JS	V1.0	2021 v1.0	Minor formatting amendments following review