



# Freedom of Information

Information on JNCC Facebook, Twitter  
and Google usage

For a Link to the FOI/EIR page visit: <http://jncc.defra.gov.uk/default.aspx?page=6077>  
For further information about the Joint Nature Conservation Committee visit:  
<http://jncc.defra.gov.uk/>

Number of FOI 201803

## Request

Under the Freedom of Information Act I would like to request the following information:

1. Does your organisation have a Facebook Page(s)? If yes, what is/are the url(s) and when were they set up?
2. Does your organisation advertise or spend any money on Facebook? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since 2004?
3. Does your organisation have a Twitter Account? If yes, what is/are the url(s) and when were they set up?
4. Does your organisation advertise or spend any money on Twitter? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since 2006?
5. Does your organisation use Google G-Suite services (Google services) or does your organisation rely on google for any services (such as email hosting)? If yes, what are the services, when were they agreed and how much did they cost?
6. Does your organisation advertise or spend any money on Google? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since the payments first began?

Many thanks in advance and I look forward to your reply.

## Reply

Thank you for your request for information, received by JNCC on Thursday 25th January 2018, which we have dealt with under the Freedom of Information Act 2000.

We have chosen to answer each question in turn.

1. Does your organisation have a Facebook Page(s)? If yes, what is/are the url(s) and when were they set up?

- <https://en-gb.facebook.com/JNCCUK/> commenced March 2016.

2. Does your organisation advertise or spend any money on Facebook? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since 2004?

- JNCC does not advertise via- nor spend money on Facebook.

3. Does your organisation have a Twitter Account? If yes, what is/are the url(s) and when were they set up?

- [https://twitter.com/JNCC\\_UK](https://twitter.com/JNCC_UK), commenced July 2013.

4. Does your organisation advertise or spend any money on Twitter? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since 2006?

- JNCC does not advertise via- nor spend money on Twitter.

5. Does your organisation use Google G-Suite services (Google services) or does your organisation rely on google for any services (such as email hosting)? If yes, what are the services, when were they agreed and how much did they cost?

- JNCC utilises Google analytics and Google custom search, which are free services.

6. Does your organisation advertise or spend any money on Google? If yes, please can you outline what expenditure has occurred and break down expenditure per calendar year (January to December) since the payments first began?

- JNCC does not advertise via- nor spend money on Google. JNCC does not use Google as a storage repository for either corporate emails or data. Further, JNCC does not corporately use G-suite for any applications.

7. Is there an official policy for the use of organisational Facebook or Twitter Accounts (ie how to post, what to use it for and when to delete or preserve records)? If there is a policy (or policies) please may I be provided with them?

- JNCC has an internal policy document for social media (Social Media Policy - 12 May 2014 [Amended 20 September 2016] see below).

Please acknowledge receipt of this email (and attachment). If you require any further detail please do not hesitate to contact us.

If you are unhappy with the service you have received in relation to your request and wish to make a complaint please contact Kirsty Meadows ([kirsty.meadows@jncc.gov.uk](mailto:kirsty.meadows@jncc.gov.uk)).

If you are still not satisfied following this, you can make an appeal to the Information Commissioner who is the statutory regulator. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Telephone: 08456 30 60 60  
01625 54 57 45  
[www.ico.gov.uk](http://www.ico.gov.uk)

Yours sincerely,

John Henson Webb

*Communications and Corporate Governance Officer*  
BSc (Hons)  
JNCC, Monkstone House, City Road, Peterborough, PE1 1JY  
Tel: 01733 866801, Direct Dial: 0773 866844  
Email: [john.hensonwebb@jncc.gov.uk](mailto:john.hensonwebb@jncc.gov.uk)



<http://jncc.defra.gov.uk>



25 years delivering innovative solutions to realise the value of nature.



Communications Policies and Procedures

# **Social Media Policy**

12 May 2014  
Amended 20 September 2016

**To find other JNCC HR policies and procedures visit:  
(THIS IS AN INTERNAL FILE LOCATION AND NOT ACCESSIBLE EXTERNALLY)**

**This policy has been agreed with Trade Union side**

# Joint Nature Conservation Committee

## HR Policies and Procedures : Social Media Policy

### Statutory Legislation

Equality Act 2010

Defamation Act 1996

Data Protection Act 1998

Human Rights Act 1998 (article 8. Schedule 1)

Regulation of Investigatory Powers Act 2000

Telecommunications (Lawful Business Practice) (Interception of Communications)

Regulations 2000 (SI 2000/2699) Freedom of Information Act 2000 Environmental Information Regulations 2004

[Employment Practices Data Protection Code](#) (on Information Commissioner's Office website)

[ACAS guidance on social networking](#)

### ***What is social media?***

***For the purposes of this policy, social media is defined as a type of interactive online media that allows instant communication with each other or to share content in a public forum. This includes online social forums such as Twitter, Facebook and LinkedIn. Social media also covers text, pictures, blogs and video and image sharing websites such as YouTube and Flickr.***

***There are many more examples of social media than can be listed here and this is a constantly changing area. Please follow these guidelines in relation to any social media used.***

### Introduction

When accessing and contributing to social media, individuals are faced with immediate decisions about acting in a responsible and safe manner. As more and more businesses, organisations and individuals are using social media (for example, 10 Downing Street uses social media to share news stories and press releases with the public), employees need to think carefully before posting any comments or opinions.

JNCC's Code of Conduct sets out the standard of conduct and behaviour expected from all staff. Breaches of these through inappropriate use of social media whether in a professional capacity or for personal use when referring to JNCC may result in disciplinary action, which could include dismissal. However, JNCC does have certain obligations under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 to provide information when requested, although certain information, particularly of a sensitive or confidential nature, is exempt from these restrictions. Check with your manager if you receive any requests of this type. The intention is not to prevent employees referring to work at JNCC but to ensure they are always mindful and comply with the standards of the Code of Conduct.

## **JNCC Policy**

This policy aims to help all employees use social media in a responsible and safe way. It applies to:

- personal use of social media at work;
- using social media in a professional capacity for JNCC;
- personal use when referring to JNCC;
- using JNCC IT devices; and
- using personal IT devices.

### **Official use of social media**

Social media can provide valuable access to news, insight and information. Using social media to better understand our stakeholders is **encouraged in JNCC**. Everyone can participate in conversations on social media in a personal capacity – including on JNCC issues. You may also engage through your personal accounts in a JNCC-related capacity but key announcements should be handled by the Communications Team and delivered through the corporate account.

Visit our corporate accounts for additional information:

[JNCC Twitter account](#)

[JNCC Facebook account](#)

[JNCC LinkedIn account](#)

However, if there is a corporate need to develop a new social media account or activity that is explicitly on behalf of JNCC (eg. a blog, or a forum for a specific stakeholder group) forming part of our external communications, you need to discuss and seek approval from the Communications Team.

Before using social media for the first time in an official/professional capacity for JNCC, individuals are required to liaise with the Communications Team who will advise on the rules and safeguards in place for social media usage. The Communications Team have prepared a bite-sized briefing on using Twitter and this is available on the intranet or can be delivered as a training course by request.

Any major announcements involving JNCC must be made by the Communications Team via the corporate social media accounts (Twitter, Facebook and LinkedIn) and must not be posted by individuals. However, corporate announcements may be re-tweeted/liked by individuals through their own accounts. Posts by individuals may be liked/retweeted through the corporate accounts and we encourage people to tag their posts with @JNCC\_UK when tweeting in their JNCC capacity.

Employees must be aware at all times that, while contributing to JNCC's social media activities, they are representing the organisation.

Rules for using Yammer, a social networking tool used in parts of JNCC, are set out in Annex 1.

## **Rules of engagement**

If you are engaging in social media in an official capacity – whether through a personal or official account – you should:

- ensure you are not the first to make a significant announcement, unless specifically agreed with the Communications Team. Significant announcements will almost always be made through a corporate account;
- disclose you work for JNCC and use only your own identity or an approved official account to comment on official business;
- disclose and comment only on public domain information unless you have specific agreement to do otherwise from the Communications Team;
- ensure that everything you write is accurate and not misleading and complies with all JNCC policies including the Code of Conduct;
- comment only on your area of expertise and authority;
- ensure you do not publish or report on conversations or information that is confidential or official sensitive or deals with internal matters;
- ensure comments are respectful of the community in which you are interacting;
- ensure comments in contentious debates are based on facts;
- adhere to the Terms of Use of the relevant social media platform/website

Individuals may not download software or apps on JNCC devices/ smartphones to facilitate access to social media websites. If this is considered necessary the case must be made in writing to the IT Services Manager for approval to do so.

### **Limited personal use of social media at work**

Individuals are allowed to access social media websites from JNCCs' computers or devices. This usage should be limited to official rest breaks such as lunch breaks unless the individual is engaging in a professional and JNCC-specific capacity.

### **Personal use of social media when referring to JNCC**

JNCC recognises that it is natural for its staff to say that they work for JNCC when using social media but they must not use JNCC's name as part of their user name within their profile (for example, the name of a blog or a Twitter name must not contain JNCC).

**Eg. NOT @NAME\_JNCC**

If staff choose to discuss their work, for example by giving opinion on their specialism or nature conservation, they must include a profile statement as follows:

*"The views I express here are mine alone and do not necessarily reflect the views of my employer."*

### **Using social media in your personal life**

JNCC understands that many employees make frequent use of social media in a personal capacity. While they are not acting on behalf of the organisation, employees must be aware that they can damage JNCC if they are recognised as being one of our employees, and do not comply with the standards of behaviour set out in the Code of Conduct. In particular Annex E explains clearly the behaviours and conduct expected of JNCC staff with regard to engaging in any political activities.

## Use of personal devices at work

JNCC accepts that employees may wish to use their own computers or devices, such as laptops and palm-top and hand-held devices, to access social media websites while they are at work.

The use of personal IT equipment when in JNCC offices is limited to the guest wireless network and should in no way be connected to the main JNCC network as referenced in the IT Security policy. Use of personal devices is only permitted during:

- official rest breaks, such as lunch breaks,
- times when employees are on duty away and travelling between locations/appointments when it is considered reasonable to access personal IT devices.

## Unacceptable Conduct

Unacceptable conduct outside of work and also outside of work time which is capable of being linked to your job can result in JNCC being brought into disrepute. Therefore, any communications that employees make in either a **professional or personal** capacity through social media must not:

<ul style="list-style-type: none"><li>• <b>Bring JNCC into disrepute, for example by:</b></li></ul>
<ul style="list-style-type: none"><li>○ criticising or arguing with colleagues in JNCC or other organisations;</li><li>○ criticising government policy, in relation to JNCC's work;</li><li>○ making defamatory comments about individuals, groups or organisations;</li><li>○ posting images that are inappropriate or links to inappropriate content; or</li><li>○ making statements that bring into question the impartiality of JNCC or are in conflict with JNCC's interests;</li></ul>
<ul style="list-style-type: none"><li>• <b>Breach confidentiality, for example by:</b></li></ul>
<ul style="list-style-type: none"><li>○ revealing trade secrets, official or personal information held in confidence or intended for JNCC use only to anyone not authorised to receive it. or sensitive management information owned by JNCC;</li><li>○ giving away confidential information about an individual (such as a colleague contact) or another organisation;</li><li>○ disclosing personal and/or sensitive personal data about JNCC employees which would enable them to be identified;</li><li>○ disclosing any confidential and/or sensitive HR information relating to both individuals and JNCC; or</li><li>○ discussing JNCC's internal workings (such as contract negotiations or its future business plans that have not been communicated to the public);</li></ul>
<ul style="list-style-type: none"><li>• <b>Breach copyright, for example by:</b></li></ul>
<ul style="list-style-type: none"><li>○ using someone else's images or written content without permission;</li><li>○ failing to give acknowledgement where permission has been given to reproduce something; or</li></ul>
<ul style="list-style-type: none"><li>• <b>Do anything that could be considered *discriminatory against, or bullying or harassment of, any individual, for example by:</b></li></ul>
<ul style="list-style-type: none"><li>○ making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age;</li></ul>



- using social media to bully another individual (such as another JNCC employee); or
- posting images that are discriminatory or offensive (or links to such content).

**\* These types of actions may constitute gross misconduct and in addition may also be unlawful and result in prosecution.**

### **Duty away**

The policy for Limited Personal Use of Social Media at Work includes duty away. However, JNCC devices may not be used to access social media for personal use overseas where this would incur data charges.

### **Use of social media in the recruitment process**

There should be no systematic or routine checking of prospective employees' online social media activities, as conducting these searches during the selection process might lead to a presumption that an applicant's protected characteristics (for example, sexual orientation or religious beliefs) played a part in a recruitment decision. This is in line with JNCC's **Equality of Opportunity policy**.

### **Monitoring use of social media during work time**

JNCC does not specifically block the use of Twitter/Facebook/other social media websites on its computers. However, JNCC does use web scanning software and mobile phone data usage reports in order to maintain security to the JNCC network and to block inappropriate websites based on standard categories.

JNCC does not actively monitor web usage of staff but does however, reserve the right to do so in compliance with the **IT Security Policy (Section 6: Monitoring of emails and internet access at work)**. JNCC considers that valid reasons for checking an employee's internet usage include suspicions that the employee has:

- been using social media websites for personal use when he/she should be working; or
- acted in a way that is in breach of the rules set out in this policy.

***Note: This includes the use of JNCC devices while out of the office.***

JNCC reserves the right to retain information that it has gathered on employees' use of the internet for a period of one year.

### **Excessive use of social media at work**

Where the use of social media in an official capacity has been agreed the line manager and individual should agree what is considered to be a reasonable level of use. Otherwise using social media should be restricted to personal time at work i.e. official rest breaks is permitted. The use of social media should not interfere with duties.

### **Disciplinary action over social media use**

All employees are required to adhere to this policy. In the event of suspected abuse of the social media policy JNCC will conduct an investigation which, if proven, will result in disciplinary action. Access to particular social media websites may also be withdrawn in cases of misuse.

Serious breaches of this policy, for example incidents of bullying of colleagues or social media activity causing serious damage to JNCC, may constitute gross misconduct and lead to summary dismissal.

***Note: Some actions which constitute gross misconduct may also be unlawful for example, serious acts of harassment or discrimination. In these situations individuals may be guilty of a criminal offence which could lead to prosecution. They may also be held personally liable as well as, or instead of, JNCC for any act of unlawful discrimination. Equality of Opportunity policy and Bullying, Harassment and Victimisation policy.***

## **Annex 1: Yammer**

### **Using Yammer**

By using Yammer you are acknowledging and agreeing to the terms of JNCC's Social Media Policy and JNCC's suite of information management and IT-related policies.

Yammer may only be used by staff, approved contractors and partners of JNCC.

Remember that, with the exception of certain contractors and partners, everyone within JNCC can view postings on the 'company feed'. This feed contains all messages except for those posted in private groups.

Be as respectful in your treatment of others on JNCC's Yammer network as you are expected to be in the workplace. Remember that you are responsible for the content you publish.

### **Creating external networks**

If you wish to create an external network you must have a valid business case. This should be presented to the Communications team in the first instance and if approved the IT Services team will then advise on viability.

### **Monitoring and management**

The IT Services team can monitor anything posted to the JNCC Yammer site (in accordance with the IT Usage Policy). This includes information posted to private groups or as direct messages.

JNCC reserves the right to remove a group or post from the network if it is deemed inappropriate.

It is everyone's job to keep Yammer as a constructive place. If you see content that you believe conflicts with the Social Media Policy, take a screen shot and email it to the IT Services team.