

# Social media policy

Last updated May 2019



## Background and purpose

This policy sets out Bracknell Forest Council's agreed approach to social media in terms of both personal and business use.

The term social media covers a wide range of interactive online tools and sites including Twitter, Facebook, Instagram, Pinterest, Snapchat, YouTube, blogs, WhatsApp and many more.

Local Government Communications defines social media as:

*'Social media is...online technologies, channels and practices used to share opinions and information, promote discussion and build relationships.'*

Corporately, social media is a useful means to:

- raise awareness of and provide access to services,
- strengthen and improve our reputation by developing a two-way conversation,
- increase the number of residents accessing services online.

Corporately, the council uses it to communicate and engage with residents and promote online access to services. The council also recognises that the majority of its staff will use or participate on social media in some way.

This policy sets out:

- [Guidelines for staff using social media in a personal capacity](#)
- [Guidelines for staff using social media in a professional/ non-corporate capacity](#) (e.g. LinkedIn)
- [Guidelines for staff using local social media groups.](#)
- [The council's corporate approach to social media.](#)

This protocol complements other council strategies and protocols, including the council's staff handbook, media protocol, ICT policy and code of conduct.

# Staff personal and non-corporate use

## Guidelines for staff using social media in a personal capacity

These guidelines are for all staff using social media in a personal capacity; at work or elsewhere and during or outside working hours and set out the standards of behaviour expected.

Remember, even outside the workplace and outside working hours, you are an employee of the council. Staff should:

- Consider all social media participation as being in the public domain, permanently available and open to being republished in other media. This could put you in a vulnerable position.
- Preserve the professional relationship between you and your colleagues, customers and partners.
- Staff employed in work where there is a recognised code of professional conduct will need to follow this in respect of contact with clients through social media. For example, it is not appropriate to 'friend' vulnerable clients on social media and professional boundaries must be maintained at all times.
- Be politically neutral, especially important if it is a requirement of your job role/ part of your contract.
- Only staff identified in the council's media protocols should act as official spokespeople; other staff should not identify themselves as official council spokespeople on social media.
- Never post personal, confidential or sensitive information you have been privy to as part of your role, this includes in 'private messages' or closed forums, for example Messenger and WhatsApp.
- Not share any information you get in a professional capacity on social media – direct or in passing. This is to ensure there is no conflict of interest.

Employee conduct, even if in a personal capacity, can be grounds for disciplinary action if it impacts on your ability to do your job. In particular, if it could:

- bring the council into disrepute,
- damage working relationships,
- or damage relationships with clients or other third parties.

### **You are considered to be personally responsible for content published in your name and via your accounts.**

To that end, it is recommended that all personal social media accounts are secured and password-protected; using a secure password that includes upper and lower case, numbers and special characters and is changed regularly.

Consider increasing your privacy settings in order to minimise the extent your social media activities fall in to the public domain. Carefully consider if it's appropriate to list your job role on your profile.

Carefully consider the origin of any post you share in your name – has it come from an organisation you wish to be associated with? Could posting it cause grounds for complaint?

For those staff in contact with children, young people or vulnerable adults, remember your commitment to safeguarding and promoting their welfare. Make sure professional boundaries are maintained at all times.

Please report any concerns over possible inappropriate use of social media to your manager.

**Social media posts in your name can give grounds for disciplinary proceedings, even if made in a personal capacity.**

## **Guidelines for staff using social media in a professional capacity**

There are many cases where participation on social media sites in a professional capacity can be beneficial, for example LinkedIn.

This activity is not proactively monitored by the council but council policies including, but not limited to, the code of conduct and Equality Act apply.

The principles below should be followed whenever using social media in a professional capacity:

- Clearly identify yourself and your role and make it clear your view is not the council's official view.
- Always be politically neutral.
- Be credible, cordial, accurate, fair and transparent.
- Be consistent.
- Be responsive. Respond to communication and share the insight you gain.
- Be legal.
- Be aware of your association with the council in online spaces. Think about the implications for the council of 'liking, 'befriending' or 'favouriting' people, brands, campaigns or pages, or of expressing personal opinions.
- Be aware of child and adult safeguarding issues – social media sites are often misused by offenders. If you have any concerns, report them to the safeguarding lead in your department.
- All requests for recorded information received via social media should be passed to [Information.Compliance-Officer@bracknell-forest.gov.uk](mailto:Information.Compliance-Officer@bracknell-forest.gov.uk).

Staff should not set up a social media page or account for business use without express permission via the process below. Non compliance may result in disciplinary proceedings.

## **Guidelines for staff using local community groups**

The communications and marketing team will scan local community groups on an ad hoc basis for issues and advise on the best way to respond. The team does not have capacity to actively monitor each group indefinitely.

If a member of staff notices an issue or factual error on a group regarding council business they should let the communications team know by emailing [comms@bracknell-forest.gov.uk](mailto:comms@bracknell-forest.gov.uk)

The communications team will take appropriate action, this may include: further monitoring of the post in question; contacting the administrator of the group for redress or to request the post is removed; refuting claims on the council's own social media/communications channels.

If a post needs urgent attention out-of-hours (for example posts regarding vulnerable residents or looked after children), the communications team can be called via Forestcare.

While staff are not prohibited from joining in conversations online, due regard should be made to:

- being politically neutral,
- being legal,
- not bringing the council in to disrepute,
- damaging relationships with colleagues, clients or third parties (this includes residents and councillors).

Staff should also consider carefully which conversations to get involved in and when it is appropriate to stop commenting on contentious subjects.

Staff should never comment in community groups as an official council spokesperson – the only exceptions are: the chief executive, directors, assistant directors, communications and marketing team.

Given the wide-spread reach of local social media community groups, administrators should be treated with the same regard as members of the media. Staff should not contact the administrator/s of groups directly about council business without liaising with the communications team. Nor should they arrange to meet with administrators or pass information on without consulting the communications team.

## **Social media complaints about staff**

The communications and marketing team will pass complaints or concerns about staff conduct on social media to the relevant line manager. The line manager will be responsible for deciding if the content breaches council policies and taking relevant action.

# Corporate use of social media

## Accountability & ownership

Communications and marketing leads the council's approach to social media and manages the council's corporate Facebook, Instagram and Twitter accounts, working closely with the customer services team and digital services and ICT team for technical support and guidance.

Customer services and other operational teams with a need to get out borough-wide messages with significant impact, for example highways, can access the corporate channels via the council's agreed social media management platform to post relevant information and respond to customer enquiries. A pre-requisite for access is completion of in-house training and obtaining a platform licence. Access to the council's social media management platform will only be given after training has been completed. The communications and marketing team retain overall ownership of the pages and can amend and delete posts, if necessary.

Service areas that have an agreed Facebook and/ or Twitter account in addition to the corporate accounts must manage their pages via the agreed social media management platform. The corporate communications team will periodically monitor accounts via this platform and take immediate action, if necessary, or signpost issues to relevant account administrators. However, in general, service teams are accountable for managing their own social media, in line with this protocol and all policies relating to it.

### Communications and marketing

In addition to managing the corporate pages, the communications and marketing team will:

- review business cases for new social media accounts in conjunction with the Assistant Director of Customer Experience/ ICT,
- provide social media advice and support,
- regularly monitor the corporate social media accounts,
- provide social media training, where needed.

### Social Media Group

The social media group shares operational best practice; it does not have any formal decision-making or strategic responsibilities. New terms of reference and governance arrangements were adopted in 2019 with any decisions fed in to the Head of Communications and Assistant Director of Customer Experience.

### Assistant Directors

Assistant Directors are responsible for ensuring daily monitoring, tracking and responding to all communications received via service specific social media pages. This is outlined and agreed to as part of the initial business case ([see Appendix A](#)).

### All employees

Employees are responsible for ensuring their posts on any form of social media, both business and personal, do not compromise the council, professional relationships with clients, customers or partner organisations, or working relationships with colleagues. No personal details or references should be made in terms of clients, customers or partner organisations. Employees are responsible for ensuring anything posted/ shared/ commented on in their name does not bring the council in to disrepute. See the [Staff Personal Use](#) section of this policy for more information.

## Requesting service specific social media

Services may request a social media account via a [business case](#), which must be agreed with the Assistant Director of the service, the Head of Communications and Marketing and the Assistant Director of Customer Experience.

The communications and marketing team will provide advice and guidance on the business case and training requirements.

The account may only be set up once the business case has been agreed; all training completed and a social media management platform licence purchased. Failure to follow this process may result in disciplinary proceedings.

***Any account without approval from the relevant Assistant Director, Head of Communications and Marketing and Assistant Director of Customer Experience must be deactivated.***

### **Business case considerations**

Requests for a new social media account must demonstrate a robust business case, including:

- Why existing established council and partner accounts do not support your need.
- What is the purpose of the account? (Specific and measurable objectives.)
- Who is your audience? Is it different to those who follow existing accounts? How will they find out about your account? Do you have a ready-made audience you can reach?
- How will you evaluate the success of your social media site?
- Resources – do you have the time to build a credible online presence and respond to any negative / contentious comments quickly?

Accounts will be monitored annually by the communications and marketing team and the social media group to gauge success and whether they are fit for purpose. If they are not fit for purpose they must be deactivated.

### **Publicity code**

We have a statutory obligation to comply with the Government's *code of recommended practice on local authority publicity*, which requires all publicity to:

- i. be lawful
- ii. be cost effective
- iii. be objective
- iv. be even-handed
- v. be appropriate
- vi. have regard to equality and diversity
- vii. be issued with care during periods of heightened sensitivity (e.g. elections)

All the council's social media posts, adverts and comments must comply with the code's recommendations. They must also comply with pre-election publicity rules. The communications and marketing team can advise further.

### **Security**

All accounts must be set up with a council drop box, which more than person has access to. It is recommended that at least two permanent members of staff create the account with help from communications and marketing. Assistant Directors are responsible for outlining who should have access to the account via the business case. Temporary members of staff can access the account as long as they have permission from the Assistant Director, a valid social media management licence and undertake training from communications and marketing.

A secure password for the account must be maintained at all times, i.e. using special characters, numbers and different case letters.

To comply with IT and HR policy and to ensure that the account is not used accidentally or maliciously by persons outside the council, passwords must be changed every 90 days as well as when staff change. Account administrators are responsible for ensuring compliance.

Communications and marketing must be provided with access to the account via the approved social media management platform. If accounts are not synced to this platform, communications and

marketing will relinquish responsibility for informing customers in an emergency situation on that account.

More than one person per service must be trained, confident in managing, and have access to the account at all times. Communications and marketing will carry out routine checks every quarter to ensure compliance.

Only trained staff may use the social media account.

All work and personal devices with access to social media must be appropriately secured.

### **Legal considerations**

Officers should only post suitable and professional comments. Anything published should pay due care to:

- intellectual property (creative commons, copyright and trademarks)
- law of confidence (duty of confidentiality)
- defamation
- consumer protection from unfair trading regulation (2008)
- Data Protection Act/ General Data Protection Regulations (GDPR)

In addition, all posts must be politically neutral in terms of party politics but can quote relevant executive members or the Mayor.

### **Branding**

It must be clear to the user that the site is owned and managed by Bracknell Forest Council - this should be done within the name or description of the social media account.

Giving your site a sense of identity will create a degree of trust by those who visit the site that the information is from a reliable source.

When creating and posting the content, the brand must always be considered, including tone, appropriateness and visual identity.

### **Leaver's process**

Anyone who has access to social media accounts via the social media management platform must be removed prior to the end of their employment. The service is responsible for notifying communications and marketing, which will deactivate the leavers administration rights within 24 working hours of notification.

Account administrators/ Assistant Directors should email: [comms@bracknell-forest.gov.uk](mailto:comms@bracknell-forest.gov.uk) with the name of the person leaving the organisation and their leaving date. For urgent assistance the team can be contacted on 01344 352323.

Anyone who has access to a BFC Facebook page outside of the social media management platform must be deactivated by another administrator on that page prior to the end of their employment. This can be accessed by the 'account roles' section.

In addition, passwords for an account without page role functionality, for example Twitter and Instagram, must be changed before the person leaves, using special characters, numbers and capital letters. This must not be shared with the person leaving.

Account administrators and Assistant Directors are responsible for compliance with the leaver's process.

### **Monitoring**

Social media accounts must be monitored at least twice a day by the service administrators. Out-of-hours monitoring may be deemed necessary subject to the purpose of the account. This will be agreed at the time the business case is considered. This is the responsibility of the service using the account. Communications and marketing takes ownership of monitoring all the main corporate



accounts; the team will provide appropriate support to service led accounts but will not take full monitoring ownership.

You must report any council reputation risks to communications and marketing as soon as they are known. Take screen shots and consider whether you need to hide any posts or block the user. Guidance on when to block a user can be found in the social media comments policy in [Appendix B](#), also on the council's website. In a major crisis or if an emergency arises during the weekend, administrators may contact communications and marketing (via Forestcare on 01344 786500) for advice and support.

### **Posting and responding**

Everything posted on social media sites should be considered public (even 'private messages' can become public).

Information about individuals must not be divulged via social media in under any circumstances. Officers should answer specific questions about individual circumstances via email, in writing or by telephone.

Service requests or enquiries should be redirected to customer services via the social media management platform.

Posts should be written in an objective and informing style. All posts made on behalf of the council will be taken as official council comment by readers. Inappropriate use of social media may result in disciplinary proceedings.

Have a strategy for responding. Be selective, especially with people disliking something or a seemingly making a joke – consider if they want you to respond and if so, how best to. Where important facts are wrong, correct them without getting drawn into debate.

Consider if overtly political responses need hiding and remove all defamatory and/or offensive posts as soon as possible.

Guidance on when to respond can be found in the social media comments policy in [Appendix B](#).

The following points will impact our reputation:

- incorrect spelling and/or grammar,
- use of text speak,
- irregular/infrequent posting,
- only seeking to promote or sell to customers, rather than engaging them,
- use of poor quality or irrelevant images,
- not responding or taking a long time to reply.

### **Closed groups**

Requests for closed groups will be considered on their individual merits but should generally be avoided. Closed groups do not ensure robustly enough that information shared cannot and will not be disclosed more widely.

### **Fraudulent access to information**

Staff should never set up social media accounts as third parties in order to access information about individuals.

### **GDPR - sharing and publishing information**

Social media accounts and posts are subject to General Data Protection Regulations (GDPR) and the Data Protection Act. This includes posts made by the account administrator and posts made on the account by a user.

Never share personal, confidential or sensitive information. You must know and follow the information security policy. **Officers must be aware of, and follow, the council's acceptable use of the internet policy.**

Only photos and videos with express permission to be used on the council's social media accounts may be posted. They must not be posted after the time stated on the consent form and photos must be removed immediately, if requested, by the person photographed – regardless of the original consent. See the council's photography policy for further guidance ([Appendix C](#))

A link to the council's privacy policy must be added to all BFC social media accounts.

### **Freedom of information requests**

Customers can log FOIs via social media and data on social media can be requested under an FOI.

All requests should be sent to the council's information compliance officer as soon as possible.

### **Young / vulnerable people**

Specific uses of social media, such as with young or vulnerable people, must comply with service specific policies and protocols.

### **Advertising**

It may be beneficial to carry out social media advertising to bolster a marketing campaign. Contact the communications and marketing team for information and costing. All council adverts must comply with the publicity code.

Council social media accounts and pages must not take on paid for advertising from third parties. This could be in breach of the code and social media terms and conditions as well as the council's third party publicity protocol.

## **Social media in emergencies/major incidents**

In the event of a major incident, where the council's emergency planning framework is triggered, the duty media officer will have primacy in updating the affected service's social media to inform the public of the emergency. An officer within the service may take this role on from the duty media officer, subject to emergency type, their availability and making themselves known to the duty officer.

Individual services will ensure only messages provided by the duty media officer, who will have authorisation from the duty senior officer/chief executive, are posted to their account.

## **We Love Bracknell: posts regarding vulnerable people**

We Love Bracknell has agreed that it will thoroughly review any request made by the [safeguarding.adults@bracknell-forest.gov.uk](mailto:safeguarding.adults@bracknell-forest.gov.uk) account to the administrator's direct email address.

Adults and children's safeguarding leads with concerns about posts putting a vulnerable person in a compromising position should email [safeguarding.adults@bracknell-forest.gov.uk](mailto:safeguarding.adults@bracknell-forest.gov.uk) and copy in [comms@bracknell-forest.gov.uk](mailto:comms@bracknell-forest.gov.uk)

Should a post appear in a different community group or other online space regarding a vulnerable person, staff should inform the communications and marketing team, which will consider the relevant course of action in conjunction with safeguarding leads and the police, where relevant.

## **Social media complaints – non staff**

Complaints about content not involving staff will be looked in to by the communications and marketing team, with appropriate action taken. It should be noted that while the communications and marketing team will actively work to resolve issues, due to the sheer breadth of social media it may not be possible to get content removed. The communications and marketing team will work with colleagues at TVP and internally if posts break the law or put vulnerable people at risk.

## Other policies and codes

The following policies and codes must be taken account of in all use of social media:

- Code of conduct for employees, specifically sections on relationships, contact with the media and professional conduct.
- Information security policy
- ICT and best practice principles, see in particular the section on internet policy
- Photography policy
- Social media comments policy

## Useful contacts

Communications & marketing ext. 2323/ [comms@bracknell-forest.gov.uk](mailto:comms@bracknell-forest.gov.uk)

Customer services ext. 2096

IT services helpdesk ext. 1100

Information security ext. 3071

Out

Out-of-hours: Forestcare 01344 786500 and ask for the duty media officer.

# Appendix A – business case

## Social media account business case and forward plan

This form is for people who have their head of service's provisional agreement for a service-based social media account.

### Guidance on completing the business case and forward plan

1. Do a first draft  
This form is designed for you to consider and manage the opportunities and risks social media brings. You don't have to write much but careful consideration now will save time and potential problems later.
2. Review the training needs for social media (below).  
What have you completed already and what do you need to complete?
3. Review with your communications and marketing account manager  
Use this time to test out your ideas and ask about things you are unsure of. Ensure you are familiar with the policies, training and strategies referred to below.
4. Get it agreed  
Once you and your account manager are happy with the business case, the head of communications will consider it. If agreed it will then be referred to the assistant director: customer experience. Finally you will need your assistant director's approval.

Proposer details	
Proposer's name	
Service / team name	
Directorate	
Assistant Director	
Name of account administrators (at least 2)	

Purpose and audience	
Objectives	
Target audience	
Justification (for not using the council account)	
Other options considered	
Services it would support	
Success criteria	

Account set up and administration	
Type of account	
Name of account	

Account to be set up with a BFC drop box that more than one person has access to.	
Administrator log in to be registered with communications and marketing	
People responsible for the account (at least 2)	
People with permission to use the account (at least 2)	
In hours management arrangements	
Out of hours management arrangements (if deemed necessary)	
Process for responding to service requests (agreed with customer services, as appropriate)	

<b>Branding</b>	
Branding complies with council identity standards	

<b>Managing reputational risk</b>	
Process for dealing with negative or abusive comments	
All administrators & editors have knowledge of media protocols	
Legal advice followed for account aimed at vulnerable people or looked after children	

<b>Supporting council strategies</b>	
Departmental strategies	

<b>Training and security</b>	
<i>Briefings on the following will be provided by the communications and marketing team:</i>	
All users have professional understanding of the GDPR/data protection act for social media (including photography)	
All users have professional understanding of copyright law for social media	
All users have professional understanding of the code of recommended practice on local authority publicity	
<i>Training / knowledge for the following is required to be undertaken by all users:</i>	
Equalities training completed by all users.	
Information security / data protection training completed by all users	
All users have professional understanding of the acceptable use of internet policy	
All users familiar with council code of conduct	

<b>Forward plan</b>	
Forward plan agreed by Communications & Marketing	

<b>Approval (signatures)</b>	
Head of Communications and Marketing	
Assistant Director: Customer Experience	
Assistant Director (relevant service)	

**Social media forward plan**

In this section you simply provide a draft messages and a schedule that you intend to use for the account. Communications and marketing account can talk these through with you with tips on timing, tone of voice and other tips.

Message	Date / frequency

**Appendix B – social media comments policy**

Bracknell Forest Council encourages debate on its social media channels and recognises that not everyone commenting will always be in agreement with the council. This debate is important for democracy and allows a two way communication process.

The council does not employ a moderation system for comments but it does have profanity filters set to high.

The majority of comments are allowed on the council's social media channels, however, there are some exceptions when comments will either be hidden or deleted, these include:

- Offensive, malicious, disrespectful comments or those that attack a person's character (defamatory comments).
- Comments that incite hatred based on religion, race, gender, nationality, sexuality or any other personal characteristic.
- Comments that give any form of personal information including addresses/ phone numbers/ email addresses.
- Any spam or third party advertisement.
- Party political messages or advertisement of political events.
- Any comments with swear words or language that could cause offense.
- Any libellous comments or those which break the law – for example illegal activity or copyright.

We also reserve the right to hide any posts from malicious or vexatious, persistent commentators, sometimes referred to as trolls, who deliberately post content to provoke a response.

We also reserve the right to remove any new comments on posts that are more than six months old and any comments that are off topic.

### **Bracknell Forest Council responses**

The council does its best to read all comments posted on its social media sites and will reply where relevant and appropriate.

Pages are monitored during the working week and responses are posted during that time.

Pages are also monitored out-of-hours for posts that contravene the above but responses may not be made until the next working day.

In general terms, the council will provide responses to questions and will also respond to any factually incorrect information. The council may choose to answer questions individually or in one overall response on posts with a large volume of comments.

Alternatively, it may choose not to reply at all, depending on the situation.

Supplementary questions will be responded to as appropriate but the council may decide to stop responding if the person's actions start to constitute vexatious behaviour.

Any FOI requests will be passed through to the council's information compliance team.

The council may choose to reply to commentators 'offline' if the situation warrants it, this could be via email or direct message. It may also encourage people to contact customer services so their question can be answered fully or may sign-post to an online form, where relevant.

### **Banning or removing followers**

Bracknell Forest Council will remove people from its social media accounts if they continue to flout the guidelines for comments – this includes vexatious commentators. The council will first ask the person to stop causing offensive or posting inappropriate/ illegal content. It will also ban any account that appears to be fake.

# Appendix C – photography policy

## Introduction

Photography and filming are key components of our publicity and engagement. This standard applies to all images taken and/or used for council business and sets out how we can benefit from these while meeting our legal obligations in terms of:

- Data Protection Act 1998
- General Data Protection Regulation (GDPR)
- Human Rights Act
- copyright
- safeguarding

Where a photograph is taken by an employee as part of their role; the first owner of the copyright is the employer, unless there is an agreement to the contrary.

## Consent

### Public places

While there is no legal restriction on photography/filming in public places, we have other legal duties, such as safeguarding, which may impact the legality of our photography/filming in a public place. We also act considerately to people's wishes and rights under GDPR.

Photographers/videographers always make reasonable endeavours so that subjects are aware of publicity photography/filming.

These include:

- placing filming notices around the area
- being obvious in our presence so not appearing to take images covertly
- only taking images of children with their parents, looking into the camera
- where applicable, include a notice in the programme, tickets and/or on social media/ website advising publicity photography/filming is taking place

This enables any person who does not wish to be photographed or filmed, to not be.

### Individuals and small groups

In order to protect the council against any action for breach of GDPR, the written permission of those in the photographs must be obtained. They must also consent to the use of photographs and for the use of video footage. This applies to photos of individuals and small groups, rather than large crowd shots. GDPR forms must specify what the image/video will be used for and how long it will be kept securely by the council.

### Consent form

The council's consent form (on DORIS) must be used for all photos of people. The council will accept another consent form (such as another council's template) provided it meets the required standards and authorises Bracknell Forest Council to use the image and it meets our obligations under GDPR.



Once the form has been signed the specified conditions must be adhered to. Photos and videos must not be used for longer than stated on the form, they must be kept securely and they must not be used if consent is withdrawn at any time.

### **Children and schools**

Children **cannot** consent to having their image taken.

Consent may be given by the parent or carer,

*or*

a head teacher with written consent from parents/carers while their child is participating in school activities.

*or*

consent may be implied in a public place where reasonable endeavours are made.

We can accept other consent forms, such as one obtained by a school, if it meets the council's standards and authorises our use of the image(s).

### **Staff**

Staff are deemed to have given their consent to being photographed as part of their employment contract. However, photos and videos of staff must not be used for anything other than council business and as best practice you should alert staff to when the video will be taken and where it will be used.

### **Withdrawal of consent**

Consent can be withdrawn at a later date for non-staff members. No further use can be made of that individual's image and it must be deleted immediately. The council does not recall any publicity in which their image appears which has already been distributed. Withdrawal of consent must be made in writing.

### **The media**

The media do not need to use council's photography consent form or sign a copyright form.

They may take any photographs while in a public place but need permission before taking photographs on privately owned land (including land/premises owned by the council).

### **Storage of images**

The council only retains images of identifiable people (other than staff) for two years unless explicitly stated in the GDPR form. After this time they must be deleted. You must not use them after that date for any purpose.

The age of the image can be found in the properties field of the file.

### **Raising a concern**

Employees and visitors who have concerns about any photography/filming taking place at an event, should contact the organiser. If appropriate, the person about whom there are concerns should be asked to leave and the event organiser or council representative should be informed.

In particular, a judgement will need to be made by the lead officer about what is fair and would reasonably be expected by members of the public and staff who attend.

### **Official photographers**

Official photographers are defined as anyone employed or commissioned by the council or schools to take photographs/video, including staff.

A list of approved official photographers/videographers (excluding staff) is available on DORIS and can be booked via the same link.

Official photographers will be allowed to take photographs in any location, as directed by the council, under the supervision of the lead officer and must abide by these guidelines.

Official photographers are required to sign the council's copyright form before undertaking any work on the council's behalf. These forms are available from the communications and marketing team and on DORIS.

### **GDPR for official photographers**

Official photographers give the council's consent form to members of the public being photographed to make sure they have given their consent.

For children under 16 years, consent should also be obtained from their parent /guardian/carer. It may be appropriate for vulnerable adults to have permission obtained by their next of kin/carer.

The consent form gives individuals the opportunity to say they do not want to be in the photograph/video. Only photographs/videos with the relevant data protection consent should be stored and reused by the council and the consent form should be saved securely with the photos.

### **Official photographers and child protection/vulnerable adults**

When taking photographs of children and/or vulnerable adults, official photographers should be supervised by an appropriate officer.

### **Staff as official photographers**

Employees of Bracknell Forest Council, including those of the borough's schools, will be classed as official photographers if they take photographs as part of their employment for publicity or marketing purposes. They are expected to use the consent form when taking photographs of members of the public and take appropriate care to ensure the guidelines are followed with taking and storing photographs.

Council staff, however, do not need to sign the copyright form as only external official photographers are required to do so.

### **Safeguarding**

If the media has been invited to a photo opportunity by the council they should be supervised by someone with a good working knowledge of safeguarding and photography.

### **Photographer conduct**

Complaints about the conduct of media photographers and camera crews should be made to the communications and marketing team or the lead officer, who will deal with the situation accordingly.

**Sharing photographs with third parties**

The council's policy on this can be found on DORIS. For further information please get in touch with the communications and marketing team.