Why These Guidelines Were Created – Purpose and Scope

From Facebook to LinkedIn, Reddit to Ravelry, Instagram to Tinder, @Work to Glassdoor, social media use plays a role in the personal lives of many BC Public Service (BCPS) employees. In 2010, the BCPS was the first public service in Canada to provide guidelines to employees for professional use of social media, the GCPE Guidelines for Government Use of Social Media by Public Service Employees. Since then, social media and the ways we use it have evolved, and the guidelines for official government social media use have been updated. This set of guidelines, the Social Media Guidelines for BC Public Service Employees, was created as a companion to the guidelines for government use, to address the many other uses of social media where employees need to consider their obligations as employees of the Province of British Columbia. Social media is a part of life that is not going away and continues to evolve. These guidelines will help employees make appropriate choices about the use of social media for personal use both in and out of the workplace and understand the potential impacts of its use in the context of their employment.

What’s the Same, What’s Different?

Public service employees make thoughtful choices every day, for example about how to interact with colleagues, talk about work outside the workplace, and share information. When it comes to social media activity, the obligation to make those thoughtful choices remains the same. As public servants we must comply with all employment-related obligations at work and outside of work. These include standards for workplace behaviour, privacy, confidentiality, conflict of interest, serving impartially and political activity as outlined in Standards of Conduct for Public Service Employees - Human Resources Policy 09, the Oath of Employment, and HR Policies (e.g. Discrimination and Harassment in the Workplace – Policy 11); standards for the Appropriate Use of Government Information and Information Technology Resources; the Freedom of Information and Protection of Privacy Act (FOIPPA); and the Election Act. The BC Public Service as the employer must comply with legislation that regulates workplace behaviour, such as the BC Human Rights Code and WorkSafeBC legislation.

The obligations in these policies and legislation apply to social media use, including employees’ personal accounts unaffiliated to the workplace. Just as the Standards of Conduct apply to employee conduct outside of work, so they apply to social media use outside of work. Employees shouldn’t speak out at protest rallies using their public service job to lend weight to their opinions – nor should they be doing that on Twitter or Reddit.

At the same time, what we say and do online is different in some key ways: for example, it can reach bigger and broader audiences, and the steps we take to restrict audiences for our online activity are different than simply looking around to see who’s within earshot. Other differences to consider are:
• how quickly and easily words and images can be circulated, and reproduced as “soundbites” out of context;
• the long shelf life of online activity (extended by sites like The Wayback Machine);
• how fast social media platforms and how we use them evolve – e.g. privacy settings; and
• diversity in how people use and think about social media as a way of connecting with others.

What Do These Guidelines Cover?
There’s no new policy in this document: the purpose of these guidelines is to alert BC Public Service employees to key considerations, as public servants, when using social media for personal use to ensure conduct remains in keeping with the Standards of Conduct and other already-existing policies and guidelines.

This includes using social media:
• During the work day for personal use;
• Outside of work hours on your own computer or device (off duty conduct);
• About work (posting about your work or coworkers on your personal social media accounts);
• In potential conflict of interest situations;
• When using work equipment (e.g. social networking using your work-issued computer or cell phone);
• Where employees face harassment or bullying online because of their employment; and
• On workplace platforms like @Work.

For guidance on using social media for work on other topics, including guidance on stakeholder engagement, record-keeping, collection of third party information, and copyright, refer to the GCPE Guidelines for Government Use of Social Media by BC Public Servants.

As social media and how people use it evolves, so will these guidelines.
Principles

One person’s social media is not another’s, but we’re all public servants. With a diverse workforce, everyone will use social media differently. What we all have in common is our responsibilities to the Oath of Employment and Standards of Conduct, and a shared commitment as public servants to maintain and enhance trust and confidence.

The following principles should guide employees’ use of social media and of these guidelines.

1. When engaging in social media activities outside of work, employees must still consider what they have committed to in the Oath of Employment and the Standards of Conduct.
2. Employees are expected to use common sense in any online activity that might impact their public service commitments.
3. These guidelines won’t cover every situation. You will always need to use your best judgment in applying the Standards of Conduct and other policies to the ways you use social media.
4. Employees should err on the conservative side in applying the Standards of Conduct and other policies to their social media behaviour. For example, don’t assume things you post online won’t become public, even if you don’t intend them to be.
5. In addition to considering intent, employees must consider perception (how might people reasonably interpret their actions), especially in relation to conflict of interest considerations.
6. When employees interact with colleagues on social media, they should consider the impact those interactions may have on the workplace environment.
7. Social media use using government equipment must consider information security and the potential to introduce vulnerabilities into the government system and/or devices.

What You Need to Know

The Standards of Conduct and the BC Public Service Ethics Framework

All BC Public Service employees agree to follow the Standards of Conduct when they swear or affirm the Oath of Employment on joining the public service. Upholding the Oath of Employment and the Standards of Conduct is a condition of employment.

It’s important to remember this overall statement that should guide our choices, including our social media choices:

Employees will exhibit the highest standards of conduct. Their conduct must instill confidence and trust and not bring the BC Public Service into disrepute. The honesty and integrity of the BC Public Service demands the impartiality of employees in the conduct of their duties.

As an employee, you are responsible for ensuring your social media activities are in line with the Standards of Conduct.
If in doubt, consider whether your actions will meet this standard.

In addition to the Standards of Conduct, employees need to follow a variety of policies and regulations in the BC Public Service’s ethics framework designed to protect information security, privacy, financial responsibilities, public trust and confidence in government, and a safe and healthy workplace. Employees are responsible for keeping all of these in mind, including when using social media.

Other legislation, policies and guidelines employees must consider include, but are not limited to:

- **Appropriate Use Policy**
- **Occupational Health and Safety Policies** and **Regulation**
- **Freedom of Information and Protection of Privacy Act (FOIPPA)**
- **The Core Policy Objectives and HR Policies** (e.g. Discrimination and Harassment in the Workplace – Policy 11).
- **BC Human Rights Code**
- Ministry-specific policies

To become familiar with government’s ethics framework and the related legislation and policies, visit **MyHR**.

For guidance on using social media in an official capacity, rather than for personal use, consult the **GCPE Guidelines for Government Use of Social Media by Public Service Employees**.

The use of social media checks is not permitted as part of the hiring process.

**Scenarios to Consider**

Consider the following scenarios – Where might these hypothetical employees get themselves into trouble? What choices are they making that may not serve them well in the workplace and as employees of the BC Public Service? If you’re unsure of what might cause problems in these scenarios, review the sections of the guidelines that follow, review the policies and guidelines referred to in these guidelines, talk with your supervisor, and consult the information posted about social media use on **MyHR**.
Here but not Here
Paul feels strongly that it’s important to be responsive on his personal social media accounts, and when his phone goes off, he checks it and responds pretty quickly. Even in a meeting, if it’s something quick, he’ll respond. He always gets his work done, but other people on his team have noticed and don’t always think he’s paying attention or being courteous.

Passion and Posting
Jeanine is a passionate anti-poverty advocate. On her personal Facebook page, she posts criticisms of what she sees as her ministry’s inaction. Her profile identifies her as a “sometimes reluctant employee of a certain very large BC government ministry.” She also posts angry comments in response to BC government ads and press releases.

Facebook Marketing
Jin has a side business and uses Facebook and Instagram for marketing it and responding to questions. She sometimes does this on work time and when she’s called in sick.

What’s Keeping Lee so Busy?
Lee isn’t always able to turn work around in the timelines her colleagues are hoping for, and they’re sometimes frustrated. When they notice that social media sites often show up on her monitor when they walk by, they start to wonder how much she’s actually working on work time.

Gary’s Frustration
Gary is part of an ongoing investigation about a complaint he launched about another employee, and he’s frustrated with the lack of results. He starts venting about his frustration on his private Facebook account, sharing details he shouldn’t. Some of his Facebook friends are also work colleagues and one of them notifies Gary’s supervisor about the posts.

Overeager Oliver
Oliver is connected with his colleague Kim on social media and sees some photos and exchanges between her and other friends that make him think Kim is in a conflict of interest with the activist group she’s part of. He takes screenshots of her photos and exchanges and sends them to his supervisor as a heads up without first determining whether or not it is appropriate.

Hint, Hint
Harley uses Twitter frequently, tweeting under the name “Harlequin.” In a recent series of tweets, Harley posted about being proud of a briefing note they wrote about options for assessing cannabis impairment and then hinted about an upcoming press release on the topic.

I Heart Your Photo
Bryan “likes” all of the posts on Instagram that show his colleague Jill in them, and sometimes comments on the photos being nice photos of her. He also responds whenever something new is posted. Jill has noticed this behaviour and is starting to feel uncomfortable.
**Make Informed Choices**

If you use social media in your daily life, you’ve made choices about how you use it. Research shows we are constantly building and refining these habits based on who we socialize with and what technologies we’re using.

These choices will vary. For example, one person may check Facebook once every few days; another will respond to posts and messages more frequently and have alerts sent to their phones. The ways people use social media can often become ingrained, making people less conscious of the choices they’re making.

Social media can be a powerful tool to build relationships and reputations. However, in the workplace, or when using social media to talk about work, you might need to use it differently than you would in other situations. Some actions you may take automatically may put the employer, or other employees, at risk.

Consult the principles in these guidelines and be on the safe side – you are responsible for making informed choices. If you’d think twice before saying it to a colleague in the lineup at Tim Horton’s, think twice before posting it online. You wouldn’t announce to a crowd of people at a job fair that you think your boss is incompetent, so don’t do it on an online recruitment site like Glassdoor.

It’s up to you to consider whether you should refrain from posting or sharing something; whether it’s possible to present yourself in your social media interactions in a way that won’t result in people questioning whether you can do your job impartially; or whether you might be in a conflict of interest.

**Trust and Consequences**

Employees are trusted to make ethical choices. You’re responsible for using your best judgment and reaching out for help when unsure.

Remember:

- Sometimes violations of these policies and regulations arising from employee social media use come to the attention of other employees, supervisors, and the employer.
- If other employees or members of the public see social media activities that constitute a conflict of interest or other violation of the Standards of Conduct, they may speak up and share that information with the employer.
- In some cases, investigations and discipline may result from online activity.
• Employees observing unethical conduct on social media can speak with their own supervisor or their ministry’s ethics advisor for guidance.

If you are a supervisor with concerns about an employee’s social media activity in relation to their employment, please contact MyHR for guidance.

Think About: Profile Choices
Could you be easily identified on your social media accounts as a BC Public Service employee? If so, that may contribute to some unintended consequences.

Remember:
• Your social media name, profile, and photos influence how people associate your work identity with your social media activity.
• If you list your job title or place of work or have photos of you next to government vehicles or in uniform, people will draw a connection between your work duties and what you post; what you post may undermine their trust and confidence in government. You may even be in a conflict of interest if the social media account is used to promote a side business. Carefully consider these choices when deciding what to post.
• Official government logos or other branding images can be used only for authorized and official government business, not for personal use.
• Disclaimers such as “Opinions are my own” may help clarify that the social account doesn’t speak on behalf of the BC government or your ministry. This doesn’t remove your obligations as a public servant. A disclaimer may not be enough to avoid perceptions that you are sharing insider information, lending weight to opinions through your position, or in a conflict of interest.

Think About: Audience and Permanence
When you share something on social media, you may only be thinking about a narrow or particular audience. However, your personal social media activities may reach a wider audience than you expect in the moment.

Remember:
• When work colleagues are added to your online social network (e.g. added as Facebook friends or LinkedIn connections), your work colleagues are now part of the audience for your activities in that network.
• Because social media is social and digital, what you intend to be private may become public. Before posting, consider carefully what would happen if your words or images were visible to a wider audience.
• Even on social media platforms like Snapchat that are designed to be impermanent, your words or images can be captured. Technology may be designed to function in one way, but people may choose to interact with it differently. For example, in seeing offensive content in a colleague’s social media, someone might take a photograph or screenshot of that content.
• We have no control over how social media platforms operate, as they are third party sites. Always err on the side of discretion.

Ask Yourself
When you use social media, consider the questions below. They will help you apply the Standards of Conduct and other policies to your activities in the workplace and outside of work.

Consider questions like these:

1. Could my comments on social media be seen as disloyal to the BC Public Service and/or bringing it into disrepute?

2. If I comment on a public issue, would I be jeopardizing the perception of impartiality in the performance of my duties?

3. If I post this, would I be using my position in government to lend weight to the public expression of my personal opinions?

4. Would this activity mean that my political activities in social media are not clearly separated from activities related to my employment?

5. Would I be engaging in political activities on social media during working hours or using government facilities, equipment or resources in support of these activities?

6. Is there any chance that my actions will be perceived as doing any of the above?
Also ask these questions about the impact your activities may have on your ability to do your work effectively and the impact they may have on others in the workplace.

1. Is my use of social media during work hours **impacting my ability to provide service** to the public or to my colleagues, or creating that perception?

2. If I post this, would I be **failing to treat other employees with respect and dignity**?

3. Is my conduct in the workplace **failing to meet acceptable social standards** and contribute to a positive work environment? If you are friends with BC Public Service employees on social media platforms, they may consider that an extension of the workplace.

4. Could my interactions with colleagues on social media constitute **harassment or discrimination**?

5. Do my social media affiliations and connections create a potential conflict or reflect negatively on how I wish to be perceived in the workplace?

Consider the following questions if you have access to any confidential information, if you are using social media on government equipment, or if you are posting images of your work or colleagues. Always keep confidentiality top of mind.

1. Is there any chance that what I’m planning to post would **disclose confidential information** that I’ve received through my employment to anyone other than persons who are authorized to receive the information? If I share this document, image, or video on social media, would that create an **information incident**?

2. Could the **apps or material** I am downloading **put the government network or government information security at risk**? The [Appropriate Use Policy](#) requires employees to obtain their supervisor’s permission before downloading applications or software to their device. Consult the [Software and Application Guide](#) for help.

3. Could the **settings** on my social media accounts on my work equipment **put the government network or government information security at risk**?

Even an innocent photo can accidentally reveal confidential information. Consider whether photos from work include images of documents, screens, or whiteboards could be enlarged to view personal or confidential information.
4. Is it possible that colleagues would have any concerns about what I’m sharing about them on social media (e.g. their personal opinions or photos?)

5. I have access to a colleague’s personal information through social media outside of work (e.g. dating site). If I share that personal information in the workplace, might my colleague have concerns?

If you answer “yes” to any of the questions above, your social media use may be violating the Standards of Conduct, the Appropriate Use Policy, or government’s obligations regarding privacy and information management.

It may also create unwanted consequences for your work environment and the public’s trust and confidence in government.

If you’re unsure about any of these policies and how they apply to social media use, talk with your supervisor or ministry ethics advisor.

Looking More Closely – Special Topics

1. Conflict of Interest

The Standards of Conduct, the Oath of Employment, and the conflict of interest guidelines provide explicit direction that public servants must avoid all conflicts of interest, whether real or perceived, and disclose any within 30 days of becoming aware of them. Employees must conduct themselves in a way that separates their personal and professional use of social media and must avoid all real, potential and perceived conflicts of interest. To become familiar with government’s ethics framework and the related legislation and policy, visit MyHR.

Conflict of interest in the use of social media may take many forms.

Perception of conflict of interest may be influenced by things like:

- how your profiles are set up;
- whether you post about your work/workplace;
- overlap between your personal activities and the subject of your work; and
- who your friends or contacts are.

Some examples of conflict of interest: Using Instagram during work time or on your work phone to market a private business; campaigning against a government decision or political party on Facebook when your profile or photos show you’re a public servant.
Ask yourself: What might my colleagues, friends, family, or members of the public think or assume about my behaviour and/or online presence?

If you have any questions or concerns, talk with your supervisor.

2. Political Expression, Public Dialogue and Public Service Impartiality

Social media makes it easy to seek information, talk about political topics, and express political opinions – often in creative and engaging ways. It also allows connection with like-minded people one might not normally connect with. BC Public Service employees, like all Canadians, have a right to political activity.

As a public service employee, how you engage in public dialogue on topics such as political parties and government policy has to take into account some special considerations because of the Oath of Employment and the Standards of Conduct. Your social media activity must not demonstrate disloyalty or a lack of impartiality in the conduct of your duties, as outlined in the Oath and Standards of Conduct. If you are required as part of your work to engage in public dialogue about your work and the work of government, your words and behaviour must be impartial, and perceived as impartial.

Specifically, under the Standards of Conduct, BC Public Service employees must not jeopardize the perception of impartiality in the performance of their duties through making public comments regarding ministry policies or entering into public debate about them. You must also avoid using your government position to lend weight to your personal opinions. Even if you don’t personally agree with government directives or policies, you must avoid making those comments publicly. It’s important for the public to be confident they can trust employees to deliver the best service possible.

What looks and feels “public” online may be different from your face-to-face life. It’s up to you to be informed and take cautious steps to ensure you’re not making inappropriate public comments or using your position to lend weight to your opinion. These steps may include a combination of some or all of the following:

- Not writing comments, Twitter posts, or blog posts that criticize government policy or direction.
- Not campaigning for a political party or initiative using your government email address or any other self-identification as a public service employee.
• Reviewing your online activity to check that it appears impartial.
• Not identifying yourself as a public service employee through your profile, photos posted, etc. if you are going to be engaging in public dialogue about political topics.
• Not listing your job when signing online petitions.
• Restricting who views your comments and regularly reviewing your privacy settings.

There are more special considerations when social media during an election period.

There are specific guidelines for employees during the election period, which includes the interregnum (beginning when the election is called and ending on election day) and transition (from election day until the new cabinet is sworn in). To ensure strict compliance with the Election Act, all Government of B.C. advertising, communications, internet/web updates, social media and citizen engagement activities are limited to public health and safety information, statutory advertising (statutory meaning advertising required by statute, regulation or policy) and responding to the public regarding services.

During this time, ministries are not allowed to publish content that may be perceived as promotional of government priorities, programs, services, policies, etc. For more information, consult the GCPE Guidelines for Government Use of Social Media by B.C. Public Servants. Employees should also be particularly conscious of their personal use of social media during an election period, because personal comments and posts about ministry work may be perceived by the public as “new promotion or engagement” and therefore contrary to the Election Act.

3. Using Your Own Social Media Accounts on Work Time

Be conscious of whether the time used for personal social media during the work day is your own time or the employer’s, and correct as necessary. As with booking personal appointments or telephoning your bank, if personal activities begin to flow into work time, check in with yourself. If you’re easily distracted, take the steps you need to minimize distraction from social media during the work day such as changing your alerts and settings; consider putting your device out of arm’s reach.

Limited, reasonable use of social media during work hours is permitted as long as it’s in line with the Standards of Conduct, Appropriate Use Policy, and other policies and guidelines. Employees should talk to their supervisors, who will provide direction about what is appropriate. Also be conscious of how your behaviour is perceived by others: for example, checking mobile devices in meetings can be seen as disrespectful to those who are speaking, and overuse of social media on your computer may be seen as misuse of work time. It’s important for the public, and our colleagues, to have trust and confidence in the public service.

In addition to the misuse of work time, using social media in the workplace can also be a problem if your personal interests conflict with your BC Public Service duties. For example, if
the social media activities you do at work or on work equipment contribute toward your earning money elsewhere (e.g. online marketing for your business), that’s a violation of the Standards of Conduct.

4. **Cyber Safety and Harassment**

The BCPS takes bullying, harassment, and threats to employee safety very seriously, including those which occur over social media. These risks may come from employees or members of the public who are disgruntled with an individual or a system. If you have any concerns for your safety because of social media activity related to your work, or if you are being harassed online because of your role as a public service employee, talk to your supervisor. WorkSafeBC legislation and the Discrimination and Harassment Policy are in place to protect employees in the event that bullying, harassment, or threats to employee safety occur.

The Occupational Health and Safety regulation prohibits BC Public Service employees from “any improper activity or behaviour at a workplace that might create or constitute a hazard to themselves or to any other person.” This includes “any threatening statement or behavior which gives a worker reasonable cause to believe that he or she is at risk of injury.”

If you’re a supervisor: when an employee is being cyber harassed or intimidated you must contact MyHR right away. You must also take immediate action to reduce or eliminate any threat as well as manage the possible effect it will have on your worker.

If you experience bullying of any kind, either directly or as a witness, take the steps outlined on MyHR to address the bullying. In the case of bullying through social media, also see the Guidelines for Cyber Harassment/Intimidation From Clients for details on what to do.

There are steps you can take to help protect yourself and your family from risks. Managing the information available about you via social networking (e.g. Facebook, Twitter, Instagram, Snapchat) is one step you can take, and resources have been created to help you do that.

Consult the Social Networking Safety Guidelines for more information on documenting these types of problematic online behaviour and on protecting yourself from the possibility of people using social media to gather information about you and to harass you.

If you’re a supervisor with employees new to roles that directly serve the public, consider including cyber safety as a topic in their onboarding.
Consider including this information in the workplace safety orientation for any new employees, as part of the new and young worker health and safety orientation. More information about the employer’s obligation to provide safety training to new and young workers is outlined on MyHR.

For information on general security topics, see the many resources linked on this Information Security Awareness page.

References


SOCIAL MEDIA GUIDELINES
for BC Public Service Employees
July 2019