

## DATA PROTECTION POLICY AND PROCEDURES.(Including Wi-Fi & Social Media Policy)

### Introduction

We are committed to a policy of protecting the rights and privacy of individuals. We need to collect and use certain types of Personal Data (PD) in order to carry on our work of managing Ibberton, Belchalwell & Woolland Village Hall. This personal information must be collected and handled securely.

The Data Protection Act 1998 (DPA) and General Data Protection Regulations (GDPR) govern the use of information about people (personal data). Personal data can be held on computers, laptops and mobile devices, or in a manual file, and includes email, minutes of meetings, and photographs.

The charity will remain the data controller for the information held. The trustees and volunteers are personally responsible for processing and using personal information in accordance with the Data Protection Act and GDPR. Trustees and volunteers who have access to personal information will therefore be expected to read and comply with this policy.

### Purpose

The purpose of this policy is to set out Ibberton, Belchalwell & Woolland Village Hall's commitment and procedures for protecting personal data. Trustees regard the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal with. We recognise the risks to individuals of identity theft and financial loss if personal data is lost or stolen.

### The following are definitions of the terms used:

Data Controller - the trustees who collectively decide what personal information Ibberton, Belchalwell & Woolland Village Hall will hold and how it will be held or used.

Act means the Data Protection Act 1998 and General Data Protection Regulations - the legislation that requires responsible behaviour by those using personal information.

Data Subject - the individual whose personal information is being held or processed by Ibberton, Belchalwell & Woolland Village Hall for example a donor or hirer.

'Explicit' consent - is a freely given, specific agreement by a Data Subject to the processing of personal information about her/him.

Explicit consent is needed for processing "sensitive data", which includes:

- (a) Racial or ethnic origin of the data subject
- (b) Political opinions
- (c) Religious beliefs or other beliefs of a similar nature
- (d) Trade union membership
- (e) Physical or mental health or condition
- (f) Sexual orientation
- (g) Criminal record

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(h) Proceedings for any offence committed or alleged to have been committed  
**Information Commissioner's Office (ICO)** - the ICO is responsible for implementing and overseeing the Data Protection Act 1998.

**Processing** - means collecting, amending, handling, storing or disclosing personal information.

**Personal Information** - information about living individuals that enables them to be identified - e.g. names, addresses, telephone numbers and email addresses. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers.

### **The Data Protection Act**

This contains 8 principles for processing personal data with which we must comply.

#### **Personal data:**

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
3. Shall be adequate, relevant and not excessive in relation to those purpose(s).
4. Shall be accurate and, where necessary, kept up to date,
5. Shall not be kept for longer than is necessary,
6. Shall be processed in accordance with the rights of data subjects under the Act,
7. Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
8. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

### **Applying the Data Protection Act within the charity**

We will let people know why we are collecting their data, which is for the lawful purpose of managing Ibberton, Belchalwell & Woolland Village Hall, its hiring, marketing, publicity for events, fundraising and finances. It is our responsibility to ensure PD is only used for this purpose unless specific consent is given or the PD is already in the public domain. Access to personal information will be limited to trustees and volunteers.

Where individuals need to be identified in public documents e.g. minutes and harm may result, initials rather than full names will normally be used.

### **Correcting data**

Individuals have a right to make a Subject Access Request (SAR) to find out whether the charity holds their personal data, where, what it is used for and to have data corrected if it is wrong, to prevent use which is causing them damage or distress, or to stop marketing information being sent to them. Any SAR must be dealt with within 30 days. Steps must first be taken to confirm the identity of the individual before providing information, requiring both photo identification e.g. passport and confirmation of address e.g. recent utility bill, bank or credit card statement.

Any concerns about complying with a SAR need to be discussed promptly with the halls named Mrs A Newman DC or with the ICO, e.g. if it is manifestly unfactual or excessive.

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## **Responsibilities**

Ibberton, Belchalwell & Woolland Village Hall is the Data Controller under the Act, and is legally responsible for complying with Act, which means that it determines what purposes personal information held will be used for.

The management committee will take into account legal requirements and ensure that it is properly implemented, and will through appropriate management and strict application of criteria and controls:

- a) Collect and use information fairly.
- b) Specify the purposes for which information is used.
- c) Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements.
- d) Ensure the quality of information used.
- e) Ensure the rights of people about whom information is held, can be exercised under the Act.

### **These include:**

- The right to be informed that processing is undertaken.
- The right of access to one's personal information.
- The right to prevent processing in certain circumstances, and
- The right to correct, rectify, block or erase information which is regarded as wrong information.
- Take appropriate technical and organisational security measures to safeguard personal information,
- Ensure that personal information is not transferred abroad without suitable safeguards,
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information,
- Set out clear procedures for responding to requests for information.

All trustees and volunteers are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them.

The Trustees will be responsible for ensuring that the policy is implemented and will have overall responsibility for:

- a) Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- b) Everyone processing personal information is appropriately trained to do so
- c) Everyone processing personal information is appropriately supervised
- d) Anybody wanting to make enquiries about handling personal information knows what to do
- e) Dealing promptly and courteously with any enquiries about handling personal information
- f) Describe clearly how the charity handles personal information
- g) Will regularly review and audit the ways it holds, manages and uses personal information
- h) Will regularly assess and evaluate its methods and performance in relation to handling personal information.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

In case of any queries or questions in relation to this policy please contact

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Name: Mrs A Newman

Contact Details: Woolland View, Ibberton, Blandford, Dorset DT11 0EJ

[ibbertonvillagehall@gmail.com](mailto:ibbertonvillagehall@gmail.com)

### **Procedures for Handling Data & Data Security**

Ibberton, Belchalwell & Woolland Village Hall has a duty to ensure that appropriate technical and organisational measures and training are taken to prevent:

- Unauthorised or unlawful processing of personal data
- Unauthorised disclosure of personal data
- Accidental loss of personal data

All trustees and volunteers must therefore ensure that personal data is dealt with properly no matter how it is collected, recorded or used. This applies whether or not the information is held on paper, in a computer or recorded by some other means e.g. tablet or mobile phone. Personal data relates to data of living individuals who can be identified from that data and use of that data could cause an individual damage or distress. This does not mean that mentioning someone's name in a document comprises personal data; however, combining various data elements such as a person's name, religious beliefs etc. would be classed as personal data, and falls within the scope of the DPA.

### **Privacy Notice and Consent Policy**

The trustees of Ibberton, Belchalwell & Woolland Village Hall (hereafter referred to as IBWVH) are committed to protecting your privacy and we comply with the data protection laws applicable to the United Kingdom. This Privacy Policy explains how we use any personal information we collect about you and forms part of our Conditions of Use for the hire of IBWVH

### **Operational Guidance**

**Email:** All trustees and volunteers should consider whether an email (both incoming and outgoing) will need to be kept as an official record. If the email needs to be retained it should be saved into the appropriate folder or printed and stored securely. Emails that contain PD personal information no longer required for operational use, should be deleted from the personal mailbox and any "deleted items" box.

Where someone not a trustee, Committee Member or contractor needs to be copied into an email e.g. a wider circulation list for an upcoming event, we encourage use of bcc instead of cc, so as to avoid their PD being shared through forwarding.

**Phone Calls:** Phone calls can lead to unauthorised use or disclosure of personal information and the following precautions should be taken:

- Personal information should not be given out over the telephone unless you have no doubts as to the caller's identity and the information requested is innocuous.
- If you have any doubts, ask the caller to put their enquiry in writing.
- If you receive a phone call asking for personal information to be checked or confirmed be aware that the call may come from some-one impersonating someone with a right of access.

**Laptops and Portable Devices:** All laptops and portable devices that hold data containing personal information must be protected with a suitable password which is changed regularly. Where sensitive data or financial information is held an encryption program should be used.

Ensure your laptop is locked (password protected) when left unattended, even for short

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periods of time.

When travelling in a car, make sure the laptop is out of sight, preferably in the boot.

If you have to leave your laptop in an unattended vehicle at any time, put it in the boot and ensure all doors are locked and any alarm set.

Never leave laptops or portable devices in your vehicle overnight.

Do not leave laptops or portable devices unattended in restaurants or bars, or any other venue.

When travelling on public transport, keep it with you at all times, do not leave it in luggage racks or even on the floor alongside you.

**Data Security and Storage:** Store as little PD as possible relating to Ibberton, Belchalwell & Woolland Village Hall on your computer or laptop; only keep those files that are essential. Personal data received on disk or memory stick should be saved to the relevant file on the server or laptop. The disk or memory stick should then be securely returned (if applicable), safely stored or wiped and securely disposed of.

Use Google Drive attached to the IBWVH password gmail account.

**Passwords:** Do not use passwords that are easy to guess. Passwords should contain both upper and lower-case letters and preferably contain some numbers.

Ideally passwords should be 6 characters or more in length.

Protect Your Password; common sense rules are:

- Do not give out your password
- Do not write your password somewhere on your laptop
- Do not keep it written on something stored in the laptop case.

**Data Storage:** Personal data will be stored securely and will only be accessible to authorised volunteers. Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately. For financial records this will be up to 7 years. Archival material such as minutes and legal documents will be stored indefinitely. Other correspondence and emails will be disposed of when no longer required or when trustees or volunteers retire.

All personal data held for the organisation must be non-recoverable from any computer which has been passed on/sold to a third party.

#### **Accident Book:**

This will be checked regularly. Any page which has been completed will be removed, appropriate action taken and the page filed securely.

Ibberton, Belchalwell & Woolland Village Hall may use general photographs of events with groups of adults at the hall for publicity purposes in accordance with its lawful basis for using PD. Photos of children must not be used without the written consent of the parent or guardian. However, Ibberton, Belchalwell & Woolland Village Hall is aware that for some individuals publicising their location could place them or their families at risk. Consequently at large events at which publicity photos may be taken a notice should be posted at the entrance, or an announcement made, providing opportunity for people to refuse taking part in publicity photographs. At small events the consent of individuals (verbal) should be obtained if their image will be clearly identifiable. Hirers are encouraged to comply with this policy.

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### **Data Subject Access Requests:**

We may occasionally need to share data with other agencies such as the local authority, funding bodies and other voluntary agencies in circumstances which are not in furtherance of the management of the charity. The circumstances where the law allows the charity to disclose data (including sensitive data) without the data subject's consent are:

- a) Carrying out a legal duty or as authorised by the Secretary of State Protecting vital interests of a Data Subject or other person e.g. child protection
- b) The Data Subject has already made the information public
- c) Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- d) Monitoring for equal opportunities purposes - i.e. race, disability or religion.

We regard the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal. If an agency asks for PD not in compliance with one of the above e.g. to obtain information about improving a service a consent form will need to be issued to the data subjects asking for their consent to pass their PD on.

—We intend to ensure that personal information is treated lawfully and correctly.

**Risk Management:** The consequences of breaching Data Protection can cause harm or distress to service users if their information is released to inappropriate people, or they could be denied a service to which they are entitled.

Trustees and volunteers should be aware that they can be personally liable if they use customers' personal data inappropriately. This policy is designed to minimise the risks and to ensure that the reputation of the charity is not damaged through inappropriate or unauthorised access and sharing.

## Appendix A

### Frequently Asked Questions

1. Does GDPR affect us? We are a small hall; we only have people's contact details for hiring. Yes, you do need to comply with the new regulations. Fines can be imposed for data breaches if you don't take some simple precautions. It's a matter of being proportionate to the situation. This sheet gives common sense steps and tips to help you comply.

2. Do we need to register with the Information Commissioner's Office (ICO)?

This is unlikely for a small voluntary organisation or charity.

3. Do we always need consent (e.g. a tick box) to use people's Personal data (PD)?

No. The ICO say: "Consent is one lawful basis for processing PD, but there are 5 others. Consent won't always be the easiest or most appropriate". If you set out the lawful basis for your use of PD in a privacy notice (e.g. "We use PD for the purpose of managing Ibberton, Belchalwell & Woolland Village Hall including..."), that allows you to use it for that purpose without needing specific informed consent via a tick box. See the example in this sheet. GDPR also allows use of PD for the purposes of a contract (e.g. a hire agreement) without specific consent.

A tick box might be needed if you want to be able to engage with people for a wider range of activities, e.g. fundraising, newsletters, or share PD with a local Club, and your lawful basis does not cover these.

4. Can we still put photos of people at hall events on our website and noticeboards?

Yes, ICO guidance indicates that photos of crowds/groups can be used for publicity if part of your lawful purpose. Do not use photos of children without written parental/guardian consent. If adults can be clearly identified it is wise to ask their consent to publish first: Partly out of courtesy but more importantly because a personal threat could be posed to some people were their location to become known. It is good practice to let people know if someone will be taking publicity photos and ask them to let the photographer know if they don't wish to be included (e.g. with a large poster at the entrance or an announcement). Encourage user groups to be careful too.

5. How long should we keep hall files that contain PD?

Different periods apply to different kinds of records: For example, financial records usually need to be kept for 6 years beyond the end of the current financial year.

Minute books, Trust Deeds etc. permanently. Hire agreements, set a policy: e.g. 3 years.

6. What do we do with old files and archives, and backup copies of data?

Files (paper or electronic) containing personal data must be kept securely. If your hall does not have a lockable cabinet in a lockable office, officers can store archives in a secure place at home (e.g. a cupboard or filing cabinet). The Parish Council office or county archives could be considered. Backups such as memory sticks and CDs must be kept in a secure, and preferably separate, place. Sort out any old files kept in cardboard boxes in unlocked sheds or store rooms and secure any PD, but don't destroy your archives because of GDPR!

7. How do we protect against data breaches, bearing in mind that our trustees and volunteers

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use their own phones, tablets, laptops, paper records and are not IT savvy?

Any trustees using PD such as booking, financial need to have their systems secured by a strong password which is changed regularly and protected by anti-virus and malware products which are regularly updated. They need to back up data.

Everyone should be reminded to have a strong password on all devices (because they hold other trustee email addresses and phone numbers), not to use or share PD other than for the lawful purpose (e.g. managing the hall) and that a serious data breach has to be reported to the ICO and the data subject within 72 hours of loss.

8. Is our committee a data controller or a data processor?

A data controller: A data controller determines the purposes and means of processing personal data.

A data processor (DP) is responsible for processing personal data (PD) on behalf of a controller, e.g. a booking secretary, manager, treasurer. Data processors could be held responsible for a data breach so they need to be extra careful about data security.

The controller must ensure contracts with data processors comply with the GDPR (e.g. an external bookings platform) and enable an employee or volunteer who is a processor to fulfil the requirements of GDPR (e.g. provide equipment, training).

It would be appropriate for someone who is processing data for your hall to also be the named contact on the privacy notice for any DP queries.

9. Can we still contract with others (e.g. The Parish Office, Hallmaster, Google Calendar) to run our bookings system, an agency to run our payroll, Mailchimp our newsletter, Dropbox?

Yes. If a third party will be acting as Data Processor on your behalf you need to satisfy yourselves that they have systems and processes in place to ensure the security of your PD. Check the small print. If it's not clear write and seek their written assurance that they hold and use PD in accordance with the GDPR.

10. Can we still use Facebook to promote the hall and local events?

Yes, but remain careful about what you post. Some halls find having a Facebook page or closed group works well for promoting community engagement, while others have had nasty experiences.

If you are posting PD you need to satisfy yourselves that it either complies with your lawful purpose or that you have informed consent from the individuals concerned. You could, for example, ask on the hiring agreement that hirers wishing their event advertised on Facebook tick a box, or invite them to post about their event on a closed group.

11. Can we share data in an emergency?

Yes, where required to save someone's life or protect them from harm from others.

12. Do we need to do a Data Protection Impact Assessment (DPIA) ?

Unlikely in relations to a village hall. This is normally only required when sensitive personal data (medical information for instance) needs to be shared with other parties. See the ICO website for information if required.



## **Cookies.**

Cookies are small files that a website places on your hard disc to enable additional features of the website to work. Currently no cookies are used on our website, so no warnings regarding user's consent will be seen when you visit the site.

## **Privacy Queries**

Any queries relating to this Privacy Policy or your personal information should be addressed to

The Trustees of Ibberton & Belchalwell Village Hall

c/o Woolland View,

Ibberton,

Blandford,

Dorset

DT11 0EJ

or email

[ibbertonvillagehall@gmail.com](mailto:ibbertonvillagehall@gmail.com)

## Appendix 2

Article 5 of the UK GDPR sets out seven key principles which lie at the heart of the general data protection regime.

Article 5(1) requires that personal data shall be:

"(a) processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');

(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation');

(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')."

Article 5(2) adds that:

"The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability')."

# IBBERTON, BELCHALWELL & WOOLLAND VILLAGE HALL

Reg. Charity No. 1095817

[www.ibbertonvillagehall.co.uk](http://www.ibbertonvillagehall.co.uk)

## WIFI TERMS OF USE POLICY 2023

In using the IBW Hall Village Hall WiFi you accept and agree to abide by the following terms of use. If you fail to do so your right to access the WiFi at IBW Hall Village Hall may be withdrawn without notice or explanation.

- Using the IBW Hall Village Hall WiFi when you hire the Hall is charged at £1 per hour.
- Hirers may only access the WiFi when they hire the Hall.
- Access to the WiFi is not permitted when the Village Hall is closed.
- Users must observe a fair use policy and avoid online activities that will hog an unreasonable share of our monthly allowance.
- It is not permitted to watch live/download TV broadcasts/programmes, as the Hall does not have a TV licence. It is also illegal to watch or download from the BBC iPlayer.
- Users accept that while using our WiFi you do not damage the reputation of IBW Hall Village Hall for example by associating us with sexist, racist, extremist or other similarly antisocial views. Misuse of computer systems is a criminal offence and can lead to criminal action under the Computer Misuse Act 1990
- You may not defame someone or damage their reputation in any way or comment on an active lawsuit while using IBW Hall Village Hall WiFi

You must not -

- attempt to upload or post anything offensive or obscene while using IBW Hall Village Hall WiFi
- participate in any abusive behaviour on social media while using the IBW Hall Village Hall WiFi
- participate in any illegal activity of any kind using IBW Hall Village Hall WiFi

- Access to the internet using IBW Hall Village Hall WiFi is entirely at the user's own risk. No liability can be accepted by IBW Hall Village Hall.
- Sites including gambling, pornography, political extremism or various other unsuitable content categories may not be accessed using IBW Hall Village Hall WiFi
- You consent to the possibility that any user's activity on the network may be monitored from time to time and anyone found to be misusing the facility will have their access blocked.
- All forms of material contained on the Internet, unless otherwise stated, are protected by copyright. Users are therefore responsible for observing the conditions of copyright on each site they visit. IBW Hall Village Hall does not accept liability for any breach of copyright by a user.

IBW Hall Village Hall intends that our WiFi should provide internet access for adults and children of all ages.

Where parents are accompanying their children at IBW Hall Village Hall then it is assumed they are responsible for their children's internet activity using the WiFi.

If children under 18 years of age attend IBW Hall Village Hall events without their parents then if they access the internet from their own device, it is assumed that they do so with the full consent of their parent(s) or guardian(s).

We strongly recommend parents and guardians supervise their children's activities where possible, to ensure they're acting responsibly online and don't over-share information with others. For more details on protecting your children please see [www.internetmatters.org](http://www.internetmatters.org)

IBW Hall Village Hall Committee reserves the right to withdraw

- the public WiFi provision at any time
- WiFi access to any individuals should they be deemed to have been in breach of any of these conditions of use.

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## SOCIAL MEDIA POLICY & PROCEDURES 2023

### I. Purpose

The purpose of this Policy is to set forth the rules, regulations, procedure and appropriate use of Ibberton, Belchalwell & Woolland Village Hall social media accounts. This Policy also includes a guideline for use of personal social media by Trustees and the management committee.

This Policy is not meant to address any particular form of social media, but rather to address the use of social media in general, including, but not limited to social media tools and applications that may result from future advances in technology.

### II. Scope

This Policy applies to all Village Hall officials. This Policy also applies to individuals who are employees of contractors, subcontractors, vendors or consultants, and other persons who provide services to the Village Hall.

"Social media" refers to social networking websites and applications including, but not limited to, Facebook, LinkedIn, Google + and Twitter, as well as blogs and video, music and photo sharing sites including, but not limited to, YouTube, Snapchat, Instagram, TikTok and Flickr. Social media also includes all means of communicating or posting information or content of any sort on the internet, including to your own or someone else's web log or blog, journal or diary, personal website, social networking or affinity website, web bulletin board or a chat room, whether or not associated or affiliated with the Village Hall.

This Policy applies to social media accessed via all types of devices, including, but not limited to, personal and/or work-issued mobile devices, computers, tablets, cell phones, etc.

Employees are free to express themselves on matters of public concern as private citizens on social media outlets with limited exceptions outlined herein. Nothing in this Policy is intended to interfere with an individual's constitutional rights; however, employees and affiliated non-employees should adhere to the guidelines set forth below when representing themselves as affiliated with the IBW Village Hall or in communicating with others affiliated with the Village.

### III. Village Social Media Accounts

**A. Creation of Accounts:** Prior to creating a new Village-affiliated social media account, a request must be submitted to the secretary for approval by the Trustees. In such request,

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the proposed creator should provide justification for establishing a new social media account and an overview of how the account will be utilized, including the main topics to be discussed or communicated on the page.

**B. Management of Accounts:** The village hall content will be co-ordinated by the secretary.

**C. Proper Use:** The Village shall utilize social media outlets to disseminate information to the public. Social media is a means for the IBW Village hall to advertise events and hall information.

1. The use of social media shall be in addition to, and not in place of, the IBW Village Hall's other means of communication already in place such as, but not limited to, email blasts and posts on the IBW Village Hall's website.

2. When possible, messaging, comment and reply capabilities shall be turned off or disabled on all IBW Village Hall social media accounts. IBW Village Hall social media accounts are intended to act as limited public forums and shall not be used as a means for individuals to contact the IBW Village Hall or to otherwise discuss IBW Village Hall issues. If comments and/or replies are disabled, a statement will be made indicating such in the "about us" or "bio" with instructions on where to send comments, questions, concerns, complaints, etc.

3. IBW Village Hall social media accounts may link, like, or otherwise associate only with social media sites of other governmental agencies. The secretary is permitted to like content of such governmental agencies, but is not permitted to post comments on other pages/accounts. The secretary is also prohibited from replying to comments made on the IBW Village Hall's social media accounts or to any messages sent via social media.

#### **IV. Personal Social Media Usage by IBW Village Hall**

**A. Guidelines:** The IBW Village Hall respects its Trustees and management committee's rights to personal expression as private citizens on personal social media sites to the extent that such expression does not impair or impede the performance of their role or adversely affect the interests of the IBW Village Hall. Ultimately, individuals are solely responsible for all activities and posts on their own social media accounts and should be aware that their posts may remain archived on the internet even if deleted.

When using personal social media accounts, the following rules and guidelines should be adhered to:

1. Officials are prohibited from using Village email addresses to register for personal social media accounts or blogs.

2. Unless otherwise authorized, officials shall not represent themselves as a spokesperson for the IBW Village Hall. Officials shall not communicate with the media on IBW Village hall's behalf without prior written consent from the Trustees

3. If a personal email, posting on social media or other electronic message could reasonably be construed to be an official IBW Village Hall communication, a disclaimer is required. An example of such disclaimer is: "The views and opinions expressed are my own and do not necessarily reflect the views of the IBW Village Hall."

4. Officials shall not knowingly publish false or misleading information about IBW Village Hall, or their co-workers, supervisors, vendors, residents or others affiliated with the Village.

5. Officials shall not publish confidential information. "Confidential information" includes internal IBW Village Hall reports, policies, procedures or other internal business-related private communications and private information about residents and others affiliated with the IBW Village Hall, such as addresses, telephone numbers, etc.

B. IBW Village Hall officials should assume that their speech and related activity on personal social media sites will be viewed by others and may reflect upon their position within the IBW Village Hall.

C. Officials should strive to always be fair and courteous, if an official decides to post complaints or criticism on social media, they should avoid using statements, photographs, video or audio that: (1) reasonably could be viewed as malicious, obscene, threatening or intimidating; or (2) might constitute discrimination, harassment or bullying. Examples of such conduct include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, age, religion, disability, sexual orientation, predisposing genetic characteristics, genetic information, national origin, military status, colour, marital status, familial status, domestic violence victim status, or any other characteristics protected by law. Social media posts that could contribute to a hostile work environment also will not be tolerated.

D. Online postings that harass or threaten any other IBW Village Hall official are expressly prohibited.

E. Officials are reminded that they serve the public they should be mindful that any communication that disparages and/or damages the public's trust may negatively impact the IBW Village Hall's ability to serve the public.

#### V. Disclaimer

Nothing contained in this Policy is intended or should be construed to impair or otherwise limit the right of any official to engage in lawfully protected and concerted activity.