INTERNAL AUDIT REPORT

FROM:	Audit and Risk Manager	**SUBJECT:**	Communications (Social Media)
TO:	Chief Executive	**DATE:**	27 February 2018
C.C.	Head of Finance		
	HR Manager		
	Media & Communications Manager		
	Portfolio Holder (Cllr. Andrew Mobbs)		

1 Introduction

1.1 In accordance with the Audit Plan for 2017/18, an examination of the above subject area has been undertaken and this report presents the findings and conclusions drawn from the audit for information and action where appropriate.

1.2 Wherever possible, findings have been discussed with the staff involved in the procedures examined and their views are incorporated, where appropriate, into the report. My thanks are extended to all concerned for the help and cooperation received during the audit.

2 Background

2.1 This is the first specific audit covering social media and its use at the Council, with the previous audit of communications (January 2015) covering the Communications Strategy.

2.2 Social media is defined as websites and applications that enable users to create and share content or to participate in social networking. Some of the most popular platforms are Facebook, Twitter and YouTube.

3 Scope and Objectives of the Audit

3.1 The audit was undertaken to test the management controls in place.

3.2 In terms of scope, the audit covered the following areas:
- Policies and training
- WDC account usage
- Usage by others
- Monitoring
- Data protection

3.3   The control objectives examined were:

- •   Staff and Members are clear on how social media should be used in work and private settings
- •   The messages posted on the Council's social media accounts are accurate and consistent
- •   The Council makes best use of the different social media platforms available
- •   The Council is able to communicate urgent messages appropriately
- •   The best use is made of Council monies spent on social media
- •   Staff using non-WDC accounts receive appropriate support to ensure that their posts are in line with WDC account standards
- •   Members are aware of how their social media usage may impact the Council
- •   Staff are aware of how their personal social media usage may impact the Council and their employment
- •   The Council responds appropriately to issues raised via social media platforms
- •   The messages being 'broadcast' by the Council are reaching the intended audience and are being understood
- •   The Council complies with relevant data protection legislation with regards to its social media use.

4   Findings

4.1   Recommendations from Previous Reports

4.1.1   Whilst this audit was concerned with Social Media, the current position in respect of the recommendations from the audit reported in January 2015 was also reviewed. The current position is as follows:

Recommendation	Management Response	Current Status
1 The links that the Communications strategy has with the People Strategy and Channel Strategy should be clearly established.	Noted. The Channel Strategy is complete. The links with the People Strategy in relation to Staff Engagement are now in place with a regular update being provided to the People Strategy Steering Group.	The Media & Communications Manager (MCM) advised that the Channel Strategy no longer exists. A new Communications Strategy is in the process of being drawn up and this will include staff engagement as appropriate.
2 The ongoing Staff Engagement work should be incorporated within the Communications Strategy.	The Staff Engagement work is incorporated within the Communication Strategy.	She highlighted that this is easier to co-ordinate now in any case as the Media team reports into HR, so there are close links between these elements.

Recommendation	Management Response	Current Status
3 The Communication Strategy Action Plan should be monitored and reported to the Senior Management Team at appropriate intervals.	An agenda item will be on the SMT agenda at regular intervals in addition to the Staff Engagement Action Plan updates.	Elements of Communications and Staff Engagement are reported to SMT as part of the People Strategy updates. The MCM highlighted that the Communications Strategy Action Plan is currently not a live document, but once the new strategy is in place the associated action plan will be covered as part of these updates.

4.2   Policies & Training

4.2.1   The MCM and the Digital Content & Social Media Officer (DCSMO) advised that there are two relevant policies. There is a specific Social Media Policy which covers how social media should be used for work purposes, including guidance as well as specific policy, and personal social media use is also covered as part of the Council's Internet Acceptable Usage Policy.

4.2.2   Whilst the latest version of the Social Media policy names both the MCM and the DCSMO directly, they highlighted that both documents had originally been drawn up before they were in post and, at the time of the audit, they were not sure whether the documents had received formal approval.

4.2.3   A search of the committee system was undertaken and, as no specific mention could be found for the social media policy, it is possible that this has not received Member approval.

Risk

It may not be possible to take action against an employee for not following the Social Media Policy if it has not received the relevant formal approval.

Recommendation

The Social Media Policy should be presented to the appropriate committee for formal approval.

4.2.4   They also added that social media was an addition to the Acceptable Usage policy, so this specific section may not have received Member approval.

4.2.5   Formal training on social media, linked with a session on discrimination and the law, has recently been prepared and will be available to staff shortly.

4.2.6   A session has already been held for Members and will be rolled out to staff with sessions for SMT, Staff Voice, and subsequently for all staff. It is anticipated that all staff will attend the training by September 2018.

4.2.7   The training materials were provided and, upon review, it was noted that there is no direct mention of the fact that the Council has a social media policy.

Risk

Staff may be unaware of the existence of the Social Media Policy.

Recommendation

The training should be amended to include details of the Social Media Policy.

4.3   **WDC Account Usage**

4.3.1   The DCSMO, as his job title suggests, has the main responsibility for using the Council's social media accounts, although other members of the Media team also have access and will undertake some of the work as required.

4.3.2   The Committee Services team also have access for updating the accounts in relation to decisions taken at committees (mainly Planning Committee), although they access this through a proxy site.

4.3.3   Access to the accounts is password controlled in line with the standard access to these platforms and the DCSMO and MCM highlighted that only a few members of Media staff know these passwords.

4.3.4   The main Social Media policy includes the guidance related to the use of the Council's social media accounts. This covers the main accounts used by the Media team as well as how individuals / teams from other areas should go about setting up their accounts and what they should be used for.

4.3.5   The MCM advised that there will also be a more general statement in the Communications Strategy, but this is in the process of being rewritten so was not available at the time of the audit.

4.3.6   The Council's website is kept up to date with a list of the official accounts in use. The DCSMO advised that each item will be posted where it is felt that it will be most effective but also highlighted that a system called Hootsuite is used which allows the posts to be disseminated to all platforms.

4.3.7   The accounts may also be used to convey information should there be a major incident. There is a Warwickshire Multi-Agency Emergency Media & Communications Plan being drafted which sets out the general guidance to relevant staff within the local authorities as to what the communications and media response arrangements are regarding major incidents.

4.4 **Usage by Others**

4.4.1   As well as the accounts directly controlled by the Media, there are a number of other Council-related accounts that are maintained by staff from other departments. The MCM and DCSMO advised that the log-in details are held for these other accounts and that the accounts are monitored by them to ensure that content is appropriate.

4.4.2   They also highlighted that when someone approaches them to set up a new account, they will be given specific training (around the Social Media policy) and the account will undergo a specific three-month monitoring programme. However, wherever possible, staff enquiring about setting up an account will be challenged as to what the reasons are for setting it up and whether the information would be better disseminated through the main, corporate accounts.

4.4.3   As well as covering use of social media in a work setting, the training that is being made available to staff covers personal use of social media. Case studies are included in the training of incidents where individuals have lost their jobs due to personal use of social media.

4.4.4   As highlighted above, Members have been given training on social media use, although this was only attended by 17 of the 46 Members. Internal Audit were informed that the training was compulsory for Members, which was considered particularly important in light of an incident involving a Member who had posted inappropriate comments to Twitter.

Risk

Members may be unaware of their 'responsibilities' regarding their use of social media.

Recommendation

The importance of attending the social media training should be reiterated to Members, with further training sessions being made available to those who did not attend the first session.

4.5 **Monitoring**

4.5.1   The DCSMO provided an overview of Hootsuite and showed how it is used to monitor the different social media channels for any mentions of the Council. As well as direct mentions (e.g. use of the Council's @Warwick_DC Twitter account), searches for other relevant phrases are undertaken.

4.5.2   The DCSMO advised that there is generally a 'rule of 24', i.e. the Council will aim to respond to all queries within 24 hours although, in reality, they aim to respond by the end of the working day.

4.5.3   As the majority of enquiries relate to bin collections etc. consideration is being given to giving Contract Services staff access to Hootsuite so that they can monitor the accounts directly rather than Media having to contact them first before providing the responses.

4.5.4   The Twitter account highlights that it is (officially) monitored at certain times, although Media staff will monitor it outside of office hours (e.g. during incidents when news and updates will need to be shared). The general aim for enquiries / complaints etc. is to get these away from Twitter (the main platform) and get the person to direct message the Council. The Council's main Twitter account was reviewed and it was confirmed that recent enquiries had been responded to in a timely manner.

4.5.5   The DCSMO and the MCM advised that there are formal targets set for the number of 'interactions' via the Council's social media channels with the main aim being to increase numbers of followers These are included in the Chief Executive's Service Area Plan.

4.5.6   Monitoring reports are prepared on a monthly basis showing total numbers of interactions, top retweets etc. but there is not currently any regular monitoring of numbers of specific service enquiries to identify the value of the use of social media (e.g. the number of calls that have not been made to the Council as the query has been answered via Twitter).

Risk

The value of social media use may not be realised.

Recommendation

The potential for monitoring the numbers of service-specific enquiries should be examined in order to identify the value of using social media.

4.5.7   They also highlighted that if there were specific social media campaigns being run the effectiveness of the use of social media would be monitored.

4.5.8   One specific example was given in that when people apply for jobs with the Council they are asked how they heard about the vacancy to establish if the Facebook page is being used etc.

4.5.9   Another example given was that if there has been an 'incident' (such as the waste collection delays over Christmas due to the weather), there may be a formal follow-up. In this instance it is being led by SMT and the use of social media is being reviewed as part of the larger 'investigation' as to how the delays were communicated to the public and managed by the teams involved.

4.5.10 They also highlighted that it might work the other way, with teams using other communications channels (e.g. the switchboard) monitoring their enquiries and contacting media to highlight that a message on our social media channels would be useful.

4.6   **Data Protection**

4.6.1   The MCM and the DCSMO advised that the content posted on the Council's social media accounts will be corporate, so will not identify individuals and will not, therefore, fall foul of any data protection legislation.

4.6.2   Where a customer contacts the Council through social media they will be asked to send direct messages where responses are required so that their details do not appear on our visible accounts. Monitoring will also pick up whether individual members of staff are being mentioned where possible.

5   **Conclusions**

5.1   Following our review, in overall terms we are able to give a SUBSTANTIAL degree of assurance that the systems and controls in place in respect of Social Media are appropriate and are working effectively.

5.2   The assurance bands are shown below:

Level of Assurance	Definition
Substantial Assurance	There is a sound system of control in place and compliance with the key controls.
Moderate Assurance	Whilst the system of control is broadly satisfactory, some controls are weak or non-existent and there is non-compliance with several controls.
Limited Assurance	The system of control is generally weak and there is non-compliance with controls that do exist.

5.3   A number of minor issues were, however, identified:

- The Social Media Policy does not appear to have been formally approved.
- The training being given on social media does not mention the policy in place.
- Member training was poorly attended.
- There is no regular monitoring of service-specific enquiry numbers.

6   **Management Action**

6.1   The recommendations arising above are reproduced in the attached Action Plan (Appendix A) for management attention.

Richard Barr
Audit and Risk Manager

Action Plan

Internal Audit of Communications (Social Media) – February 2018

Report Ref.	Recommendation	Risk	Risk Rating*	Responsible Officer(s)	Management Response	Target Date
4.2.3	The Social Media Policy should be presented to the appropriate committee for formal approval.	It may not be possible to take action against an employee for not following the Social Media Policy if it has not received the relevant formal approval.	Low	Media & Communications Manager / Digital Content & Social Media Officer	The policy is under review and approval will be obtained.	May 2018
4.2.7	The training should be amended to include details of the Social Media Policy.	Staff may be unaware of the existence of the Social Media Policy.	Low	Media & Communications Manager / Digital Content & Social Media Officer	This will be included prior to the next sessions being run.	1 March 2018
4.4.4	The importance of attending the social media training should be reiterated to Members, with further training sessions being made available to those who did not attend the first session.	Members may be unaware of their 'responsibilities' regarding their use of social media.	Medium	Learning & Development Officer / Senior Committee Services Officer	Members will be offered further dates and Group Leaders will be emailed to ensure they know who has attended the training.	March 2018

Report Ref.	Recommendation	Risk	Risk Rating*	Responsible Officer(s)	Management Response	Target Date
4.5.6	The potential for monitoring the numbers of service-specific enquiries should be examined in order to identify the value of using social media.	The value of social media use may not be realised.	Low	Media & Communications Manager / Website Manager	This information exists in a disparate format. The Media & Communications Manager will work with the new Website Manager to pull it together into a useable format for producing a report.	July 2018

* Risk Ratings are defined as follows:

High Risk: Issue of significant importance requiring urgent attention.
Medium Risk: Issue of moderate importance requiring prompt attention.
Low Risk: Issue of minor importance requiring attention.