

West Surrey Shadow Authority		
Report title: Social Media Policy for Councillors		
Report to: Constitution Sub-Committee		
Date: 6 August 2026		
Executive Portfolio Holder: Cllr Victoria Kiehl Contact Email: Victoria.Kiehl@westsurrey.gov.uk		
Report of Statutory Officer: Susan Sale, Monitoring Officer (interim) Contact Email: susan.sale@westsurrey.gov.uk		
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Wards affected: All Ward councillors informed: No		
Exempt from publication: No		
Key Decision: No	If a Key Decision, date registered on Forward Plan: N/A	
Report cleared for publication by:		
People Workstream	N/A	N/A
Equalities Impact Assessment complete	N/A	N/A
Senior Responsible Officer (or their delegate)	N/A	N/A
S151 Officer	Vicky Radford	28 July 2026
Monitoring Officer	Susan Sale	28 July 2026
Executive Portfolio Holder consultation	Cllr Victoria Kiehl	28 July 2026
Committee Chair consultation	Cllr Richard Wilson	28 July 2026
Head of Paid Service	Andy Brown	Not available

1. Executive Summary

- 1.1** This report presents a proposed Social Media Policy for Councillors of West Surrey Shadow Authority, for inclusion in the Constitution. The Policy has been prepared having regard to the existing arrangements of the sovereign Councils and the Local Government Association's updated guidance on councillors' use of social media. By drawing on national guidance and good practice, the policy aims to ensure councillors are well-equipped to navigate the digital environment in a professional and inclusive manner, establishing a clear and consistent framework for Members' online activity.
- 1.2** The policy aims to support councillors in engaging with residents effectively, whilst protecting the Council's reputation, ensuring compliance with legal obligations, and upholding the Member Code of Conduct. Adoption of the policy will minimise risks and promote consistent standards of behaviour across all online platforms.
- 1.3** The Constitution Sub-Committee is asked to consider the proposed Policy and recommend to the Standards Committee for recommendation to the Shadow Authority for its inclusion in the Constitution, both during the Shadow Period and post Vesting Day. Adoption of the Policy will support Members to use social media safely and effectively, provide clarity about the standards expected of them and help maintain public confidence in the Council's ethical governance arrangements.

2 Recommendations:

2.1 That the Constitution Sub-Committee resolves to:

- 2.1.1** Consider the proposed Social Media Policy for Councillors, attached at Appendix 1, and recommend it to the Standards Committee;

2.2 That the Standards Committee recommends that the West Surrey Shadow Authority resolves:

- 2.2.1** To approve the Social Media Policy for Councillors for inclusion in the Constitution, both during the Shadow Period and for Post vesting Day; and
- 2.2.2** To authorise the Monitoring Officer, in consultation with the Chair of the Standards Committee, to make minor amendments to the Policy to reflect changes in legislation, statutory guidance, Local Government Association guidance or Council arrangements, provided that such amendments do not materially alter the purpose or effect of the Policy.
 - 2.2.2.1** To note that training to support councillors in using social media is included within the Member Development Programme.

3 Reason(s) for recommendation:

- 3.1** The Shadow Authority requires a clear and consistent framework to support all Members in using social media safely, effectively and responsibly.
- 3.2** Effective communication is vital for councillors and social media can play a key role in achieving this. This policy aims to provide councillors with a clear and practical framework for responsible, ethical, and lawful use of social media. This in turn will protect the integrity and reputation of the Shadow Authority and its members while promoting open and professional digital engagement
- 3.3** Inclusion of the Policy in the Constitution will provide a transparent and consistent basis for advising Members and considering concerns arising from their use of social media.
- 3.4** Adoption of a single Policy will avoid inconsistent arrangements being carried forward from the predecessor councils and will support public confidence in the ethical governance arrangements of both the Shadow Authority and the new West Surrey Council.

4 Next steps

- 4.1** Subject to the recommendations of the Constitution Sub-Committee, the proposed Social Media Policy for Councillors will be considered by the Standards Committee.
- 4.2** If endorsed by the Standards Committee, the Policy will be recommended to the Shadow Authority for approval as part of the Constitution, both during the Shadow Period and post vesting Day.
- 4.3** Following approval by the Shadow Authority, the Policy will be incorporated into the Constitution and published on the Future Surrey website.
- 4.4** The Policy will form part of the Member Development Programme and appropriate training and guidance will be provided to support Members in understanding their responsibilities when using social media.
- 4.5** The Monitoring Officer will keep the Policy under review and report any substantive amendments through the appropriate constitutional governance arrangements.

5 Exemption from publication

- 5.1** All of this report is not exempt from publication.

6 Background and Proposal

- 6.1** The Shadow Authority has adopted the Local Government Association (LGA) Model Code of Conduct for Councillors as part of its Constitution. The Code sets out the standards of conduct expected of Members and applies to all forms of communication and interaction, including electronic communications and social media activity where a Member is acting, or could reasonably be perceived to be acting, in their capacity as a councillor.
- 6.2** Social media has become an important tool for councillors to engage with residents, share information about Council business and participate in local democratic debate. However, the increased visibility, permanence and reach of online activity can present legal, ethical and reputational risks if not managed appropriately.
- 6.3** A review of the predecessor authorities in West Surrey identified that two District / Borough Councils have adopted dedicated guidance for councillors' use of social media. The remaining predecessor authorities relied on the Members' Code of Conduct and general governance arrangements.
- 6.4** The proposed Social Media Policy for Councillors builds upon the guidance previously adopted by the predecessor councils and has been updated having regard to the LGA's latest guidance on councillors' use of social media.
- 6.5** The Policy is intended to complement the Members' Code of Conduct by providing practical guidance on the appropriate use of social media. It explains how the principles of the Code apply in an online environment and supports Members in engaging with residents in a professional, respectful and lawful manner.
- 6.6** The Policy includes guidance on acting in an official capacity, maintaining respectful dialogue, protecting confidential and personal information, complying with legal obligations, avoiding predetermination, managing online abuse, maintaining cyber security and the responsible use of emerging technologies, including artificial intelligence.
- 6.7** The Policy is intended to support Members in carrying out their role confidently and effectively. Advice and guidance will continue to be available from the Monitoring Officer as required.
- 6.8** Subject to approval by the Shadow Authority, the Policy will form part of the West Surrey Shadow Authority Constitution and, post Vesting Day, the West Surrey Council Constitution and will be supported by Member training as part of the ongoing development programme.

7 Consultation

- 7.1** The proposed Social Media Policy has been developed having regard to the LGA's guidance on councillors' use of social media, the existing

guidance adopted by predecessor authorities and a review of recognised good practice across local government.

7.2 Consultation has taken place with the Chair of the Standards Committee and any comments will be updated verbally at the meeting.

7.3 Consultation has also taken place with the Portfolio Holder for Governance, Democracy and Corporate Services and any comments will be updated verbally at the meeting.

8 Key Risks

8.1 Without a clear policy, Members may be unsure how the Members' Code of Conduct applies to social media and may inadvertently expose themselves or the Shadow Authority to reputational damage through inappropriate online activity.

8.2 Inappropriate use of social media may also expose individual Members or the Shadow Authority to legal risks, including breaches of data protection legislation, confidentiality obligations, copyright and defamation law.

8.3 Adoption of the proposed Policy will assist in mitigating these risks by providing Members with practical guidance supported by training and advice from the Monitoring Officer.

9 Options

9.1 The Constitution Sub-Committee is asked to consider the proposed Policy and recommend it to the Standards Committee for endorsement and onward recommendation to the Shadow Authority.

9.2 Option 1 – (Recommended) Approve the proposed Social Media Policy for Councillors, as set out in Appendix 1, for inclusion within the Constitution and support the provision of Member training.

9.3 Option 2 – Retain the current position and rely solely on the Members' Code of Conduct without adopting a dedicated Social Media Policy.

9.4 Option 3 – Instruct officers to prepare an alternative Policy. This would require additional officer time and resources and would delay implementation. There is no evidence that an alternative approach would provide greater benefit than the proposed Policy, which reflects current LGA guidance and recognised good practice.

10 Issues for consideration

10.1 Financial Implications

- 10.1.1 There are no direct financial implications arising from the recommendations contained in this report.
- 10.1.2 Any Member training associated with implementation of the Policy will be delivered through existing Member development arrangements and existing budgets.

10.2 Section 151 Officer Commentary

10.2.1 West Surrey will operate in a very challenging financial environment, with significant budgetary pressures from increasing demand and costs of service delivery, coupled with limited financial resources and reducing government funding. West Surrey Council will be increasingly reliant on Council Tax as the primary source of income.

10.2.2 Decisions made by the sovereign councils in West Surrey and the West Surrey Shadow Authority will need to consider the ongoing financial impact and ensure that expenditure does not exceed the resources available. It is vital that significant importance is placed on effective financial management and medium-term financial sustainability to achieve a balanced budget position and protect delivery service.

10.2.3 A clear social media policy is a risk mitigation for West Surrey Council.

10.3 Legal Implications

- 10.3.1 Section 27 of the Localism Act 2011 requires relevant authorities to promote and maintain high standards of conduct by Members and to adopt a Code of Conduct consistent with the Nolan Principles of Public Life.
- 10.3.2 The proposed Social Media Policy supports the implementation of the Members' Code of Conduct by providing practical guidance on its application in an online environment. It does not create additional legal obligations but assists Members in complying with existing statutory and common law duties.
- 10.3.3 The Policy reflects relevant legislation and legal principles, including the Human Rights Act 1998, Equality Act 2010, Data Protection Act 2018 and UK GDPR, Defamation Act 2013, common law duties relating to confidentiality and bias, and other relevant legislation governing the conduct of public office holders.

10.4 Monitoring Officer Commentary

- 10.4.1 The Monitoring Officer is supportive of the adoption of a Social Media Policy, as research by the LGA shows that a high percentage of code of conduct complaints now arise from the use of social media. Having

an adopted policy will allow members to be clear and will provide consistency, and this should be supported by member training.

10.5 People/Human Resources Implications

- 10.5.1 There are no direct human resources implications arising from this report.

10.6 Equality and Diversity Implications

- 10.6.1 The Public Sector Equality Duty applies to the Council when it makes decisions. The duty requires us to have regard to the need to:
- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act. In summary, the Act makes discrimination etc. on the grounds of a protected characteristic unlawful
 - (b) Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
- 10.6.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).
- 10.6.3 This duty has been considered in the context of this report and it has been concluded that there are no equality and diversity implications arising directly from this report.

10.7 Climate Change and Sustainability Implications

- 10.7.1 The proposed Policy has no direct climate change or sustainability implications.
- 10.7.2 The adoption of a policy may provide greater confidence for more Members to utilise digital communication may reduce reliance on printed material and support more sustainable methods of engagement where appropriate.

10.8 Stakeholders Implications

- 10.8.1 The proposed Policy primarily affects elected Members and co-opted Members of West Surrey Council by providing a consistent framework for the responsible use of social media.
- 10.8.2 The Monitoring Officer will support the implementation of the Policy by providing advice, guidance and Member training where appropriate.

- 10.8.3 If the Policy is adopted by West Surrey Council, then it may be used by the Town and Parish Councils post vesting day, if they choose to do so.

11 Overview & Scrutiny Comments

- 11.1 Not applicable.

12 List of Appendices

- 12.1 Appendix 1 – Proposed Social Media Policy for Councillors.

13 List of Background papers

- 13.1 West Surrey Council Constitution – [Members' Code of Conduct.](#)
- 13.2 Local Government Association – [Guidance for Councillors' Use of Social Media.](#)