

Social Media Policy Guide

Why does your organisation need a Social Media Policy?

A social media policy ensures that everyone is on the same page. It protects both your organisation and those who are running your social channels, whether staff or volunteers, giving them the confidence to run your communications creatively and engagingly but safely and appropriately. Writing a social media policy is a great way to involve the whole team, with policy falling under trustee responsibility to identify and manage risks. Use your policy to ensure consistency and to keep your communications aligned with your organisation's mission.

With social media, there is real danger that a member of the team might misrepresent your organisation – the post can be deleted but the damage may already be done. The risk here is serious reputational damage. It shouldn't be the case that this fear prevents your team from using social media to the maximum advantage and reach, and your social media policy should guide your team to maintain brand voice while mitigating risk.

Further reading: The Charity Commission are in the process of putting together some guidance about the risks of social media for charities, and why trustees should engage with this. There is currently an open consultation (closes 14 March 2023). Read the guidance here: <u>Charity Commission Draft Guidance Open Consultation</u>.

Key areas you might want to cover:

- Roles and responsibilities
- Security protocols
- A plan of action for a security or PR crisis
- An outline on how to comply with the law
- Guidance for staff / volunteers' personal social media accounts
- Staff / volunteer advocacy guidelines
- Staff / volunteer wellbeing on social media



There are some really helpful guides and templates from NCVO, Charity Comms and Hootsuite. Start by reading around the subject and asking yourself and your team how the advice relates to your organisation specifically and ask exactly what you want your social media policy to do for you. Use the templates provided but make sure to tweak them to suit you exactly. A copied template will not help, it needs to be tailored to your organisation specifically to benefit those who will be using it. Involve all relevant team members in the process and review your draft policy with key stakeholders and, if possible, a legal expert. Make sure all staff and volunteers have read it – you could include it in your employee / volunteer handbook for new starters to read. Finally, don't forget to update it and enforce it!

<u>NCVO Guide to developing a Social Media Policy</u> – this is a great place to start. The guide raises some questions that you may want to discuss as a team and concludes with some case law to allow you to contextualize real-world scenarios, particularly around individual's use of their personal social media accounts and how this may reflect on an organisation (this is a difficult question and one that you will need to think about in the context of your organisation, though the Charity Comms template below strikes a nice balance).

<u>Charity Comms – Social Media Policy template</u> – This is a comprehensive template which focuses not just on the do's and don'ts but on the reasoning behind the policies, which can be really beneficial when outlining new guidelines. Read the 'tips for using this template' on the webpage before downloading the template (or see copied template below). You could mirror this template's structure in your own policy document, with an introductory section highlighting why a social media policy is needed, draft guidelines and a final summary offering explanations of key legal terms and processes.

<u>Hootsuite – How to Write a Social Media Policy</u> - The online article clearly sets out why organisations need a social media policy for employees, what to include and how to implement it. The downloadable template is brief compared to the Charity Comms template, though offers a handy scenario-based framework for you to add to and make your own.

These resources from NCVO, Charity Comms and Hootsuite can be downloaded from the above links, though have been included below for your convenience:

NCVO Guide to Developing a Social Media Policy - Pages 3-4.

Charity Comms Social Media Policy Template – Pages 5-13

Hootsuite Social Media Policy for Employees Template – Pages 14-15

Drafted by Becky Daybell, Project Officer, February 2023





NCVO Guide to Developing a Social Media Policy:

SOCIAL MEDIA POLICY GUIDE

Because employers will have different rules and expectations with regard to the use of Social Media at work, policies should reflect the context in which staff are expected to work. These guidelines are designed to help small charities consider the range of factors that may be relevant when drafting such a policy.

When drafting your Social Media Policy, use the following questions/points to guide the areas to cover:

- Who will the policy apply to?
- Define what you mean by social media and give examples of what you would include.
- When does the social media policy apply? In work hours and out of work hours? On personal equipment and equipment owned by the charity?
- How does each social media platform relate to the work environment? For example, does the charity encourage all staff to Tweet as a way to raise awareness of the charity, but has a different policy towards Facebook?
- Many staff will have a personal social media profile and this will rarely impact on their work-life. However, in drafting your policy you should consider setting expectations about how the charity is portrayed and whether you allow your charity name to be associated with staff through their personal social media platforms.
- Personal use of social media is this permitted during working hours? Is this permitted on work equipment? When should personal devices be used? What restrictions do you want to consider?
- Do the employees' duties require them to speak on behalf of the charity on social media? If yes, should any approvals be sought? Is any training required? What should employees do if they are contacted by the press or social media outlet for comment about the charity?
- Do you have specific 'dos' and 'don'ts' for your employees when using social media? For example most charities will need to make the following rules clear to all staff but you may have particular rules. Staff must not post disparaging or defamatory statements about the organisation or its stakeholders. They should make it clear in social media postings that they are speaking on their own behalf (unless they are posting as part of their job role). They must not post comments about sensitive business-related topics, such as performance. If they see content on social media that disparages or reflects poorly on the charity they should refer this to the Chief Executive. They must not post anything that could be considered

discriminatory against, or bullying or harassment of, an individual. Most organisations will stipulate that these rules apply as much to personal social media as they do to the charity's accounts.

- Employers have the right, in certain circumstances, to monitor their employee's usage of the internet or email at work. Your policy (and Privacy Notice) should make this clear if that is your practice. However, impact assessments must be carried out where monitoring may result in a risk to the rights and freedoms of data subjects.
- Do you use social media as part of your recruitment processes, i.e. do you use internet searches to perform due diligence on candidates? If this is relevant, then this should also be reflected in your Privacy Notice.
- Make clear that any breach of the policy may lead to action being taken under the organisation's disciplinary policy.
- Remember that social media is constantly changing and charities should regularly review its social media policy to ensure it is up-to-date.

Relevant cases

- FORBES V LHR AIRPORT Ltd [2019] IRLR 890 EAT. The Employment Appeal Tribunal (EAT) held that on the facts of this case, the employer was not vicariously liable for racial harassment when an employee posted a discriminatory image her Facebook account. The image was not posted while at work, or on a work computer, it was shared amongst a private group which did not include the Claimant, and it made no reference to her employer.
- BARBULESCU V ROMANIA 61496/08 ECHR In this Romanian case, the European Court of Human Rights (ECHR) accepted that the employee's right to a private life had been affected when his employer accessed his Yahoo messages. However, the ECHR went on to hold that the employer's actions were justified in the circumstances and not in breach of art. 8 of the European Convention of Human Rights.
- GAME RETAIL LTD V LAWS EAT/0188/14. The Employment Appeal Tribunal (EAT) held that a tribunal erred in failing to take full account of the public nature of Twitter when finding that the claimant's dismissal for posting offensive tweets was unfair. The EAT did not provide general guidance on dismissals for social media misuse because each case is different.



Charity Commission Social Media Policy Template:

[Add your charity's logo]

SOCIAL MEDIA POLICY

A guide for staff on using social media to promote the work of [charity name] and in a personal capacity

This policy will be reviewed on an ongoing basis, at least once a year. [Charity name] will amend this policy, following consultation, where appropriate.

Date of last review: [date]

Produced from a CharityComms template See <u>charitycomms.org.uk/membership</u> for more

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Introduction

What is social media?

Social media is the term given to web-based tools and applications which enable users to create and share content (words, images and video content), and network with each other through the sharing of information, opinions, knowledge and common interests. Examples of social media include Facebook, Twitter, LinkedIn and Instagram.

Why do we use social media?

Social media is essential to the success of communicating [*charity name*]'s work. It is important for some staff to participate in social media to engage with our audience, participate in relevant conversations and raise the profile of [*charity name*]'s work.

Why do we need a social media policy?

The difference between a personal and professional opinion can be blurred on social media, particularly if you're discussing issues relating to [charity name]'s work. While we encourage the use of social media, we have certain standards, outlined in this policy, which we require everyone to observe. Publication and commentary on social media carries similar obligations to any other kind of publication or commentary in the public domain.

This policy is intended for all [staff members of all levels, volunteers and trustees (delete as appropriate)], and applies to content posted on both a [charity name] device and a personal device. Before engaging in work-related social media activity, staff must read this policy.

Setting out the social media policy

This policy sets out guidelines on how social media should be used to support the delivery and promotion of [charity name], and the use of social media by staff in both a professional and personal capacity. It sets out what you need to be aware of when interacting in these spaces and is designed to help staff support and expand our official social media channels, while protecting the charity and its reputation and preventing any legal issues.

Internet access and monitoring usage

There are currently no access restrictions to any of our social media sites in the [charity name] office. However, when using the internet at work, it is important that staff refer to our [policy name i.e. IT Policy]. You are permitted to make reasonable and appropriate use of personal social media activity during your lunch breaks. But usage should not be excessive and interfere with your duties.

Point of contact for social media

Our [team name or individual name] is responsible for the day-to-day publishing, monitoring and management of our social media channels. If you have specific questions about any aspect of these channels, speak to the [job title]. No other staff member can post content on [charity name]'s official channels without the permission of the [job title].

Which social media channels do we use?

[Charity name] uses the following social media channels:

[List your charity's social media accounts such as Facebook, Twitter and Instagram, and include the links. For example: www.facebook/charityname]

[Explain what you use these social media accounts for and who your audience(s) is/are. For example: [Charity name] has a Facebook account which it uses to share news with supporters (females, primarily aged 20-40) and to encourage people to become involved in our work].

Guidelines

Using [charity name]'s social media channels — appropriate conduct

1. [Team name or individual name] is responsible for setting up and managing [charity name]'s social media channels. Only those authorised to do so by the [job title] will have access to these accounts.

2. [Add in content about the days/hours you check social media and respond to comments. For example, our digital communications officer responds to comments Monday-Friday, 9am-5pm, and then on evenings and weekends we have a social media out-of-hours rota, covered by the whole communications team.]

3. Be an ambassador for our brand. Staff should ensure they reflect [charity name] values in what they post and use our tone of voice. Our brand guidelines set out our tone of voice that all staff should refer to when posting content on [charity name]'s social media channels.

4. Make sure that all social media content has a purpose and a benefit for [charity name], and accurately reflects [charity name]'s agreed position.

5. Bring value to our audience(s). Answer their questions, help and engage with them

6. Take care with the presentation of content. Make sure that there are no typos, misspellings or grammatical errors. Also check the quality of images.

7. Always pause and think before posting. That said, reply to comments in a timely manner, when a response is appropriate.

8. If staff outside of [team name] wish to contribute content for social media, whether non-paid for or paid for advertising, they should speak to the [team name] about this.

9. Staff shouldn't post content about supporters or service users without their express permission. If staff are sharing information about supporters, service users or third party organisations, this content should be clearly labelled so our audiences know it

has not come directly from [*charity name*]. If using interviews, videos or photos that clearly identify a child or young person, staff must ensure they have the consent of a parent or guardian before using them on social media.

10. Always check facts. Staff should not automatically assume that material is accurate and should take reasonable steps where necessary to seek verification, for example, by checking data/statistics and being wary of photo manipulation.

11. Be honest. Say what you know to be true or have a good source for. If you've made a mistake, don't be afraid to admit it.

12. Staff should refrain from offering personal opinions via [charity name]'s social media accounts, either directly by commenting or indirectly by 'liking', 'sharing' or 'retweeting'. If you are in doubt about [charity name]'s position on a particular issue, please speak to [team name].

13. It is vital that [*charity name*] does not encourage others to risk their personal safety or that of others, to gather materials. For example, a video of a stunt.

14. Staff should not encourage people to break the law to supply material for social media, such as using unauthorised video footage. All relevant rights for usage must be obtained before publishing material.

15. Staff should not set up other Facebook groups or pages, Twitter accounts or any other social media channels on behalf of [*charity name*]. This could confuse messaging and brand awareness. By having official social media accounts in place, the [*team name*] can ensure consistency of the brand and focus on building a strong following.

16. [Charity name] is not a political organisation and does not hold a view on party politics or have any affiliation with or links to political parties. We have every right to express views on policy, including the policies of parties, but we can't tell people how to vote.

17. If a complaint is made on [charity name]'s social media channels, staff should seek advice from the [job title i.e. head of communications] before responding. If they are not available, then staff should speak to the [job title i.e. director of communications].

18. Sometimes issues can arise on social media which can escalate into a crisis situation because they are sensitive or risk serious damage to the charity's reputation. Examples might include: [include example crisis situations for your charity]. The nature of social media means that complaints are visible and can escalate quickly. Not acting can be detrimental to the charity.

The [team name] regularly monitors our social media spaces for mentions of [charity name] so we can catch any issues or problems early. If there is an issue that could develop or has already developed into a crisis situation, the [team name] will do the following: [add in your crisis management plan].

If any staff outside of the [team name] become aware of any comments online that they think have the potential to escalate into a crisis, whether on [charity name]'s social media channels or elsewhere, they should speak to the [job title i.e. head of communications] immediately.

Use of personal social media accounts — appropriate conduct

This policy does not intend to inhibit personal use of social media but instead flags up those areas in which conflicts might arise. [*Charity name*] staff are expected to behave appropriately, and in ways that are consistent with [*charity name*]'s values and policies, both online and in real life.

1. Be aware that any information you make public could affect how people perceive [charity name]. You must make it clear when you are speaking for yourself and not on behalf of [charity name]. If you are using your personal social media accounts to promote and talk about [charity name]'s work, you must use a disclaimer such as: "The views expressed on this site are my own and don't necessarily represent [charity name]'s positions, policies or opinions."

2. Staff who have a personal blog or website which indicates in any way that they work at [charity name] should discuss any potential conflicts of interest with their line manager and the [team name]. Similarly, staff who want to start blogging and wish to say that they work for [charity name] should discuss any potential conflicts of interest with their line manager and the [team name].

3. Those in senior management, and specialist roles where they are well known in their field of expertise, must take particular care as personal views published may be misunderstood as expressing [charity name]'s view.

4. Use common sense and good judgement. Be aware of your association with [charity name] and ensure your profile and related content is consistent with how you wish to present yourself to the [general public, colleagues, partners and funders (delete as appropriate)].

5. [Charity name] works with several high profile people, including [celebrities, journalists, politicians and major donors (delete as appropriate)]. Please don't approach high profile people from your personal social media accounts to ask them to support the charity, as this could hinder any potential relationships that are being managed by [team name]. This includes asking for retweets about the charity. If you have any information about high profile people that have a connection to our cause, or if there is someone who you would like to support the charity, please speak to the [team name] to share the details.

7. If a staff member is contacted by the press about their social media posts that relate to [*charity name*], they should talk to the [*team name*] immediately and under no circumstances respond directly.

8. [Charity name] is not a political organisation and does not hold a view on party politics or have any affiliation with or links to political parties. When representing [charity name], staff are expected to hold [charity name]'s position of neutrality.

Staff who are politically active in their spare time need to be clear in separating their personal political identity from [*charity name*], and understand and avoid potential conflicts of interest.

9. Never use [charity name]'s logos or trademarks unless approved to do so. Permission to use logos should be requested from the [team name].

10. Always protect yourself and the charity. Be careful with your privacy online and be cautious when sharing personal information. What your publish is widely accessible and will be around for a long time, so do consider the content carefully. When you are using social media sites at work, it is important that you do so safely. You can find more information on your responsibilities when using our computer systems in our [policy name i.e. IT Policy].

11. Think about your reputation as well as the charity's. Express your opinions and deal with differences of opinion respectfully. Don't insult people or treat them badly. Passionate discussions and debates are fine, but you should always be respectful of others and their opinions. Be polite and the first to correct your own mistakes.

12. We encourage staff to share tweets and posts that we have issued. When online in a personal capacity, you might also see opportunities to comment on or support [charity name] and the work we do. Where appropriate and using the guidelines within this policy, we encourage staff to do this as it provides a human voice and raises our profile. However, if the content is controversial or misrepresented, please highlight this to the [team name] who will respond as appropriate.

Further guidelines

Libel

Libel is when a false written statement that is damaging to a person's reputation is published online or in print. Whether staff are posting content on social media as part of their job or in a personal capacity, they should not bring [*charity name*] into disrepute by making defamatory comments about individuals or other organisations or groups.

Copyright law

It is critical that all staff abide by the laws governing copyright, under the Copyright, Designs and Patents Act 1988. Never use or adapt someone else's images or written content without permission. Failing to acknowledge the source/author/resource citation, where permission has been given to reproduce content, is also considered a breach of copyright.

Confidentiality

Any communications that staff make in a personal capacity must not breach confidentiality. For example, information meant for internal use only or information that [charity name] is not ready to disclose yet. For example, a news story that is embargoed for a particular date. Please refer to our [policy name i.e. Confidentiality Policy] for further information.

Discrimination and harassment

Staff should not post content that could be considered discriminatory against, or bullying or harassment of, any individual, on either an official [*charity name*] social media channel or a personal account. For example:

- making offensive or derogatory comments relating to sex, gender, race, disability, sexual orientation, age, religion or belief
- using social media to bully another individual
- posting images that are discriminatory or offensive or links to such content

Lobbying Act

Charities are legally allowed to campaign to bring about a change in policy or law to further their organisational purpose. In most cases, spending on charity campaigns that are in accordance with charity law will not be regulated under electoral law. However, the Lobbying Act, which was passed in January 2014, states that during national elections (known as regulated periods) spending on campaigning activities may be regulated.

Charities which spend more than £20,000 in England or £10,000 in Scotland, Wales or Northern Ireland, during the regulated period, need to register with the Electoral Commission. To abide by the Lobbying Act, campaigning activities on social media must not be seen as intending to influence people's voting choice. During these periods, all campaigning activity will be reviewed by the [job title].

Use of social media in the recruitment process

Recruitment should be carried out in accordance with the [policy name i.e. Recruitment Policy], and associated procedures and guidelines. Any advertising of vacancies should be done through HR and the [team name]. [Vacancies are shared routinely on LinkedIn (amend/delete as appropriate)].

There should be no systematic or routine checking of candidate's online social media activities during the recruitment process, as conducting these searches might lead to a presumption that an applicant's protected characteristics, such as religious beliefs or sexual orientation, played a part in a recruitment decision. This is in line with [charity name]'s [policy name i.e. Equal Opportunities Policy].

Protection and intervention

The responsibility for measures of protection and intervention lies first with the social networking site itself. Different social networking sites offer different models of interventions in different areas. For more information, refer to the guidance available on the social networking site itself. For example, Facebook. However, if a staff member considers that a person/people is/are at risk of harm, they should report this to the [job title] immediately.

Under 18s and vulnerable people

Young and vulnerable people face risks when using social networking sites. They may be at risk of being bullied, publishing sensitive and personal information on their profiles, or from becoming targets for online grooming.

Where known, when communicating with young people under 18-years-old via social media, staff should ensure the online relationship with [*charity name*] follows the same rules as the offline 'real-life' relationship. Staff should ensure that young people have been made aware of the risks of communicating and sharing information online, and given guidance on security/privacy settings as necessary. Staff should also ensure that the site itself is suitable for the young person and [*charity name*] content and other content is appropriate for them. Please refer to our [policy name i.e. Safeguarding Policy].

Responsibilities and beach of policy

Everyone is responsible for their own compliance with this policy. Participation in social media on behalf of [charity name] is not a right but an opportunity, so it must be treated seriously and with respect. For staff, breaches of policy may incur disciplinary action, depending on the severity of the issue. Please refer to our [policy name i.e. HR policy] for further information on disciplinary procedures. Staff who are unsure about whether something they propose to do on social media might breach this policy, should seek advice from the [job title].

Public Interest Disclosure

Under the Public Interest Disclosure Act 1998, if a staff member releases information through [*charity name*]'s social media channels that is considered to be in the interest of the public, [*charity name*]'s [policy name i.e. Whistleblowing Policy] must be initiated before any further action is taken.

Hootsuite Social Media Policy Template:

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Last revision: [insert date]

STATEMENT AND SCOPE

As an employee and representative of [organisation name], you are expected to demonstrate best practices and appropriate etiquette on social media, including but not limited to the following:

- [insert guideline, e.g., Be respectful to all, No hate speech, No confidential company info, etc.]
- [guideline]
- [guideline]
- [guideline]
- [guideline]
- [as many guidelines as is necessary]

Customer Inquiries

[Describe process staff/volunteers are expected to follow when a client contacts them via social media.]

Questionable content

[Describe process staff/volunteers are expected to follow when coming across misinformation, news leaks, confidential information, or other questionable content regarding the organisation on social media.]

TACTICAL GUIDELINES FOR EMPLOYEES

When do I need approval to post a message on social media?

[insert answer, including who to contact for approval]

What kind of information am I allowed to post related to my work on social media?

[insert answer and examples]

Should I include my organisation info in my social media bio? Or should I keep my organisation accounts and my personal accounts separate?

[insert answer and examples]

What should I do on social media during a PR crisis?

[insert answer and examples]

How do I comply with copyright law on social media?

[insert answer and examples]

CONSEQUENCE OF BREACH

[Clearly describe the discipline process for failure to comply with the social media policy]

ANNUAL REVIEW

This policy will be reviewed once per year. All employees will be provided with access to a copy.