



# SOCIAL MEDIA POLICY

Effective for all Employees, volunteers, trustees, and learners on or after 1 September 2023

Date of next Review: September 2026

**Please note:** A formal, full review of this document will take place on a 3-yearly basis. However, in the interim, the document will be updated as necessary to remain current with any statutory legislation and/or significant Government guidance updates on the subject.

## DOCUMENT CONTROL

**DOCUMENT TITLE:** SOCIAL MEDIA POLICY

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**CHANGE AUTHORITY:** THE BOARD OF TRUSTEES

Frances Deeley

**Signature:**



**Date:** 25.07.23

**Designation:** Chief Executive Officer **Review Date:** September 2026

## CHANGE MECHANISM

Any person seeking to alter this document must consult the author before making any change.

ESS Change Authority must endorse any alterations to the approved version of this document before any wide dissemination of the altered document version.

The person making the alteration must indicate every change between the previous (approved) document version and the altered document version.



## **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, and applies to content posted on both a ESS Education and Support Services 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 ESS Education and Support Services, 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 ESS Education and Support Services office. However, when using the internet at work, it is important that staff refer to our 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**

The Media and Communications Officer is responsible for the day-to-day publishing, monitoring and management of our social media channels. ESS will appoint a Media and Communications Officer, at a time that is viable for the organisation. Until appointment is made, the Chief Strategy Officer will undertake the role and responsibilities of the Media and Communications Officer (as referenced in this document). If you have specific questions about any aspect of these channels, speak to the Media and Communication Officer. No other staff member can post content on ESS Education and Support Services' official channels without the permission of the Chief Strategy Officer.

ESS Education and Support Services uses the following social media channels:

ESS Education and Support Services plan to create and develop Facebook and LinkedIn in 2023, and to further develop and create a Twitter and Instagram profile in 2024.

These social media accounts will be used to reach our current and potential service users. As ESS is a new organisation, these social media accounts will be set up over the first 3 year trading period. The aim of these accounts is to share news with supporters and to encourage sponsorships and partnerships with local communities, education providers and businesses.

### **Guidelines**

#### **Using ESS Education and Support Services's social media channels — appropriate conduct**

1. The Media and Communications Officer is responsible for setting up and managing ESS Education and Support Services social media channels. Only those authorised to do so by the Chief Strategy officer will have access to these accounts.
2. Our Media and Communications Officer responds to comments Monday-Friday, 9am-5pm, during business hours, this does not include bank holidays, and times when ESS Education and Support Services is closed.
3. Be an ambassador for our brand. Staff should ensure they reflect ESS Education and Support Services 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 ESS Education and Support Services' social media channels.



4. Make sure that all social media content has a purpose and a benefit for ESS Education and Support Services and accurately reflects ESS]'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 other than the Media and Communications Officer wish to contribute content for social media, whether non-paid for or paid for advertising, they should speak to the Media and Communications Officer 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 ESS. 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 ESS Education and Support Services' social media accounts, either directly by commenting or indirectly by 'liking', 'sharing' or 'retweeting'. If you are in doubt about ESS' position on a particular issue, please speak to the Chief Strategy Officer
13. It is vital that ESS Education and Support Services 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 ESS Education and Support Services. This could confuse messaging and brand awareness. By having official social media



accounts in place, the Media and Communications Officer can ensure consistency of the brand and focus on building a strong following.

16. ESS Education and Support Services 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 ESS Education and Support Services' social media channels, staff should seek advice from the Media and Communications Officer before responding. If they are not available, then staff should speak to the Chief Strategy Officer.

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. The nature of social media means that complaints are visible and can escalate quickly. Not acting can be detrimental to the charity.

The Media and Communications Officer regularly monitors our social media spaces for mentions of ESS 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 Media and Communications Officer will do the following:

1. Identify and isolate the crisis. (Secure any breach in confidentiality is required)
2. Respond promptly to the comment/issue. (Maintaining a formal tone, ensuring that the ESS brand remains professional and appropriate, do not get defensive, acknowledge the issue)
3. Move communication to private message promptly.
4. Then move communication internally to the phone or an email (ensure all is recorded)
5. Ensure that everyone relevant internally is informed of the situation.
6. Resolve the issue as effectively, and quickly as possible.

If any staff outside of the Media and Communications Officer become aware of any comments online that they think have the potential to escalate into a crisis, whether on ESS's social media channels or elsewhere, they should speak to the Media and Communications Officer immediately.

To avoid a crisis situation from occurring ESS will maintain all social media accounts on a locked computer in a locked office, and not laptop or mobile/smart device. Access to the social media accounts will be restricted to the Media and Communications Officer, the Chief Strategy Officer, and the Chief Executive Officer, to ensure that only approved posts will go live. Passwords for the social media accounts will be changed every 6 months, or immediately if any of the above roles change position or leave the organisation.

## **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. ESS Education and Support Services staff are expected to behave appropriately, and in ways that are consistent with ESS's values and policies, both online and in real life.

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

2. Staff who have a personal blog or website which indicates in any way that they work at ESS should discuss any potential conflicts of interest with their line manager and the Media and Communications Officer. Similarly, staff who want to start blogging and wish to say that they work for ESS Education and Support Services should discuss any potential conflicts of interest with their line manager and the Media and Communications Officer.

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 ESS's view.

4. Use common sense and good judgement. Be aware of your association with ESS and ensure your profile and related content is consistent with how you wish to present yourself to the general public, colleagues, partners and funders.

5. ESS Education and Support Services as charity may work with several high profile people, including [celebrities, journalists, politicians and major donors]. 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 the Senior Management Team. 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 Chief Executive Officer to share the details.

7. If a staff member is contacted by the press about their social media posts that relate to ESS, they should talk to the CEO immediately and under no circumstances respond directly.

8. ESS Education and Support Services 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 ESS, staff are expected to hold ESS' position of neutrality. Staff who are politically active in their spare time need to be clear in separating their personal political identity from ESS Education and Support Services, and understand and avoid potential conflicts of interest.

9. Never use ESS's logos or trademarks unless approved to do so. Permission to use logos should be requested from the Chief Executive Officer.

10. Always protect yourself and the charity. Be careful with your privacy online and be cautious when sharing personal information. What you 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 Information Security 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 ESS 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 Media and Communications Officer 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 ESS Education and Support Services 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 ESS 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 ESS 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 Chief Executive Officer.

### **Use of social media in the recruitment process**

Recruitment should be carried out in accordance with the Safer Recruitment Policy, and associated procedures and guidelines. Any advertising of vacancies should be done through HR and the Media and Communications Officer.

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 ESS's Equality and Diversity 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 Designated Safeguarding Lead 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 ESS Education and Support Services 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 ESS content and other content is appropriate for them. Please refer to our Safeguarding and Child Protection Policy and Prevent Policy.

## **Responsibilities and breach of policy**

Everyone is responsible for their own compliance with this policy. Participation in social media on behalf of ESS 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 Staff Conduct Policy and Staff Disciplinary 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 Media and Communications Officer.

## **Public Interest Disclosure**

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