

Social Media Policy

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Key Contact	Caitlin De Souza
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This policy outlines the duty and responsibility of staff and volunteers working on behalf of Healthwatch Greenwich .	
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Contents

Introduction	3
Why do we use social media and what can we use it for?	3
Why do we need a social media policy?	3
Responsibilities and breach of policy	3
Setting out the social media policy	3
Application	3
Point of contact for social media and authority to post on Healthwatch Greenwich social media accounts	4
Use of personal social media accounts – appropriate conduct	6
Further guidelines: using social media in a professional and personal capacity	8
Defamation	8
Copyright law	8
Confidentiality	8
Accessibility	9
The Lobbying Act	9
Use of social media in the recruitment process	9
Protection and intervention	9
Under 18s and vulnerable people	10
Public Interest Disclosure	10

Introduction

Why do we use social media and what can we use it for?

Social media is essential to the success of communicating Healthwatch Greenwich's work. It is important for designated staff and volunteers to participate in social media to engage with our audiences and stakeholders, contribute to relevant conversations, and raise the profile of Healthwatch Greenwich's work.

Why do we need a social media policy?

We want to ensure that all staff and volunteers using social media represent and reflect Healthwatch Greenwich in the best way possible. It is also important to mitigate risks (such as reputational or legal issues) associated with the use of social media to protect our staff, volunteers and work. Publication and commentary on social media carry similar obligations and is subject to the same laws as other kinds of publication or commentary in the public domain.

Failure to comply with this policy could expose Healthwatch Greenwich to reputational damage and legal consequences as well as putting staff, volunteers, service users and board members at risk.

Responsibilities and breach of policy

Breaches of policy or inappropriate behaviour may incur disciplinary action, depending on the severity of the issue. Please refer to our Volunteer Policy and Employee Disciplinary Procedure for further information on our processes. Staff and volunteers who are unsure about whether something they propose to do on social media might breach policies should seek advice from the Chief Executive Officer.

Setting out the social media policy

Application

This policy applies to all social media platforms used by staff and volunteers (including board members and interns) in a professional and personal capacity.

This policy also applies to online blogs, wikis, podcasts, forums, and messaging-based apps, such as WhatsApp. Social media can be accessed in various ways, including from a desktop or laptop computer, tablet or smartphone. This policy applies to the use of all such devices.

Point of contact for social media and authority to post on Healthwatch Greenwich social media accounts

Our Communications Officer is responsible for the day-to-day publishing, monitoring and management of our social media channels. If you have questions about any aspect of these channels, please speak to the Communications Officer. No other staff member or volunteer is permitted to post content on Healthwatch Greenwich's official channels without the permission of the Communications Officer. The Chief Executive Officer has overall ownership of these accounts and only those authorised to do so by the Chief Executive Officer will have access to these accounts.

Rules for use

1. Be an ambassador for our brand

Staff and volunteers must ensure they reflect Healthwatch Greenwich values in what they post and use our tone of voice. Our [brand guidelines](#) set out our style that all staff and volunteers should refer to when posting content on Healthwatch Greenwich's social media channels. Please note only the Communications Officer is permitted to respond to comments on our social media posts on behalf of the organisation. All posts and comments should be attributed to the charity and not an individual.

2. Always pause and think before posting

Staff and volunteers must not reveal their personal opinions via our accounts by 'liking', 'sharing' or 'reposting' as Healthwatch Greenwich, unless it is clear that you are doing so as an individual staff member or volunteer as part of an approach agreed with the Chief Executive Officer. If you are in doubt about Healthwatch Greenwich's position on a particular issue, please speak to the Chief Executive Officer.

3. Obtain consent

Staff and volunteers must not post content about service users or stakeholders without their express permission. If staff or volunteers are sharing information about service users or third-party organisations, this content should be clearly labelled so our audiences know it has not come directly from Healthwatch Greenwich. If using interviews, videos or photos that clearly identify a resident, volunteer or member of a third-party organisation, staff and volunteers must ensure they obtain consent.

4 (a) Put safety first

It can be challenging participating on social media and there may be times where staff or volunteers could be subject to unpleasant or abusive comments directed at the charity, our work or people. We encourage everyone who is on social media on behalf of the charity to be aware of our safeguarding practices to deal with online abuse and consult with the Chief Executive Officer where possible.

4 (b) Vexatious, Offensive and Abusive Comments.

Any comments that are likely to cause distress or disruption, without any justified or proper cause can be deemed a vexatious comment. Comments to take action against include:

- Use of offensive, malicious, disrespectful or defamatory comments, including those that attack a person's character.
- Comments that incite hatred based on religion, race, gender, nationality, sexuality or any other personal characteristic.
- Comments containing spam or third-party advertisements.
- Comments containing libellous comments or those which break the law – for example comments around illegal activity or copyright.
- Requests for information that has already been provided, or to reconsider issues that have already been dealt with.
- Where complying with the request would negatively impact Healthwatch Greenwich's ability to provide their service to others.

If you discover a comment or post that you think should be removed or reported, please contact the Communications Officer.

5. Remain politically neutral

Healthwatch Greenwich is not associated with any political organisation and does not have any affiliation with or links to political parties. We can express views where appropriate on policies that impact our work and service users, but it is essential that Healthwatch Greenwich remains, and is seen to be, politically neutral.

We cannot endorse a political party or candidate. We must carefully manage the risk that we are perceived to have any party-political bias and should carefully consider any posts which might be perceived as such, for example, posts which talk about individual politicians or parties rather than policies.

6. Know what to do in a crisis

Sometimes issues can arise on social media which can escalate into a crisis because they are sensitive or risk serious damage to the charity's reputation. Examples might include publishing sensitive information on a service user, partner organisation or staff member. The nature of social media means that complaints are visible and can escalate quickly. Not acting can be detrimental to the charity or our people. The Communications Officer regularly monitors our social media spaces for mentions of Healthwatch Greenwich so we can catch any issues or problems early. If there is an issue that could develop or has already developed into a crisis, the Communications Officer will inform the Chief Executive Officer and report the incident following the Charity Commission's serious incident reporting procedure.

If any staff or volunteers outside of Healthwatch Greenwich become aware of any comments online that they think have the potential to escalate into a crisis, whether on Healthwatch Greenwich's social media channels or elsewhere, they should speak to the Chief Executive Officer immediately. It is the responsibility of all staff and volunteers to report complaints or comments that could escalate into a crisis or have serious implications for the charity. Only the Communications Officer in consultation with the Chief Executive Officer is permitted to amend or delete content in a crisis.

See further guidance from CharityComms regarding [crisis communications and best practice](#).

Use of personal social media accounts – appropriate conduct

Healthwatch Greenwich staff and volunteers are expected to behave appropriately, and in ways that are considerate of Healthwatch Greenwich values and policies, both online and in real life.

1. Separate your personal views

If you are using your personal social media accounts to promote and talk about Healthwatch Greenwich's work, you must use a disclaimer such as: "Views are my own" or "The views expressed on this site are my own and don't represent Healthwatch Greenwich's positions, policies or opinions." Those in senior management including board members and public-facing or 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 Healthwatch Greenwich's view.

2. Discuss risks and conflicts of interest

Staff and board members who have a personal blog, social media profile or website which indicates in any way that they work at Healthwatch Greenwich should discuss any potential risk or conflicts of interest with their line manager. Similarly, staff or board members who want to start blogging and wish to say that they work for Healthwatch Greenwich should discuss any potential risk or conflicts of interest with their line manager.

3. Don't approach stakeholders directly

Healthwatch Greenwich works with several high-profile organisations and individuals, including NHS Trusts and local council representatives. Please don't approach high-profile people or organisations from your personal social media accounts to ask them to support Healthwatch Greenwich's work, as this could hinder any potential relationships that are being managed by Healthwatch Greenwich. This includes asking for reposts.

If you have any information about high-profile people or organisations that have a connection to our cause, or if there is someone who you would like to encourage to support our work or views, please speak to the Healthwatch Greenwich Communications Officer to share the details.

4. Refer press enquiries

If a staff member or volunteer is contacted by the press about their social media posts that relate to Healthwatch Greenwich, they should talk to the Chief Executive Officer immediately and under no circumstances respond directly.

5. Protect your privacy

All staff and volunteers should keep their passwords confidential and change them often. Staff should not 'friend' or personally connect with service users, funders and volunteers via social media.

6. Help us to raise our profile (where appropriate)

We encourage staff and volunteers to share posts that we have issued. When online in a personal capacity, you might also see opportunities to comment on or support Healthwatch Greenwich and the work we do. Where appropriate and using the guidelines within this policy, we encourage staff and volunteers to do this as it helps users connect to us and raises our profile.

However, please take care to think about the reputation of the charity. If your personal social media account is not professional or otherwise appropriate for our audiences, please do not use it to amplify or promote the charity, as to do so

brings risks both to you personally and to the charity. Similarly, if the content is controversial or misrepresented, please highlight this to the Communications Officer who will respond as appropriate.

7. Avoid logos or trademarks

Never use Healthwatch Greenwich's logos or trademarks unless approved to do so. Permission to use logos must be requested from the Communications Officer and any content created must adhere to our brand guidelines. If permission is granted, content must be approved by the Communications Officer before publishing.

8. Staying safe online

Staff and volunteers should be vigilant regarding suspicious content or links and must not reveal personal, confidential or sensitive information about themselves or others. Staff and volunteers should be wary of fake accounts that may claim to be Healthwatch Greenwich and should immediately notify the Chief Executive Officer if a fake account is identified.

Further guidelines: using social media in a professional and personal capacity

Defamation

[Defamation](#) is when a false statement that is damaging to a person's reputation is published in print (such as in media publications) or online (such as Instagram Story, Facebook Live, Snapchat post). Whether staff or volunteers are posting content on social media as part of their job or in a personal capacity, they should not bring Healthwatch Greenwich into disrepute by making defamatory comments about individuals or other organisations or groups.

Copyright law

It is critical that all staff or volunteers abide by [the laws governing copyright](#), under the Copyright, Designs and Patents Act 1988, when representing the charity. 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 and volunteers make must not breach confidentiality. For example, information meant for internal use only or information that Healthwatch Greenwich is not ready to disclose yet. For example, a news story that is embargoed for a particular date, or information from people

who the charity has worked with which is private. Please refer to our Confidentiality and Data Protection Policy for further information.

Accessibility

In line with [Healthwatch Greenwich's Accessibility Policy](#) we endeavour to ensure our social media is as accessible as possible.

The Lobbying Act

Charities are legally allowed to campaign to bring about a change in policy or law to further their organisational purpose but can never be party political. In most cases, spending on charity campaigns that are in accordance with charity law will not be regulated under electoral law (often known as the 'Lobbying Act'¹).

Under the Lobbying Act, organisations (including charities which spend more than £10,000 across the UK on 'regulated activity' during the regulated period need to register with [the Electoral Commission](#) within the outlined windows for elections.

Regulated activity is any activity which could reasonably be seen as intended to influence people's voting choice, either for parties or candidates (which a charity could never do) or for categories of candidates (e.g. female candidates, or candidates who support Net Zero). During these periods, all campaigning activity will be reviewed by the Communications Officer.

Use of social media in the recruitment process

Recruitment should be carried out in accordance with the Recruitment and Selection Policy and associated procedures and guidelines. Any advertising of vacancies should be done through the Chief Executive Officer and promoted through approved channels.

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 or volunteer considers that a person/people is/are at risk of harm, they should report this to the Chief Executive Officer immediately in line with our safeguarding policies.

¹ Set out initially in the [Political Parties, Elections and Referendums Act 2000](#), as amended by [the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014](#) and [the Elections Act 2022](#).

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 or radicalisation. Where known, when communicating with vulnerable or young people under 18-years-old via social media, staff and volunteers should ensure the online relationship with Healthwatch Greenwich follows the same rules as offline.

Staff and volunteers should be aware that children under the age of 13 should not be encouraged to create their own personal social media accounts or engage with others and are not legally allowed to use social media channels such as Facebook, Instagram or X.

Staff and volunteers should ensure that vulnerable and young people have been made aware of the risks of communicating and sharing information online, and given guidance on security and privacy settings as necessary. Staff and volunteers should also ensure that the site itself is suitable for the vulnerable or young person and Healthwatch Greenwich content and other content is appropriate for them. Please refer to [Healthwatch Greenwich's Safeguarding Children and Young People Policy](#).

All staff members and volunteers have a responsibility to do everything possible to ensure that vulnerable and young people are kept safe from harm. If you come across anything online that could mean someone is at risk, you should follow Healthwatch Greenwich's safeguarding procedures.

[The Online Safety Act 2003](#) has introduced measures to ensure children are protected online.

Public Interest Disclosure

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

Please note: While all attempts have been made to cover an extensive range of situations, it is possible that this policy may not cover all eventualities. There may be times when professional judgements are made in situations not covered by this document.

It is expected that in these circumstances staff will always consult with the Chief Executive Officer where possible or advise the team of the justification for any such action already taken or proposed.