

Social Media Policy: staff use of corporate and personal channels

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1. Scope

This policy applies to all National Autistic Society employees (including casual, temporary and agency workers) and volunteers who use social media, either on behalf of the charity or in a personal capacity/outside their role with the charity: collectively referred to as 'staff' in this policy.

The policy applies to content posted on both a National Autistic Society device and a personal device – and on both National Autistic Society and personal social media. Before engaging in work-related social media activity, staff must read this policy.

Breach of this policy could be regarded as 'gross misuse of social media' for the purposes of our Conduct Management Policy and may be treated as gross misconduct.

2. Policy summary

For charities, social media is a vital way to engage supporters, stakeholders, decision makers, and the wider public.

The National Autistic Society operates corporate channels on Facebook, Twitter, Instagram, LinkedIn and YouTube. There are also other accounts owned and managed by different teams across the charity, as detailed pages 2-3 below.

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

If you have any questions regarding this Policy, please email socialmedia@nas.org.uk

3. Top tips

Use of corporate social media channels

1. The PR and Social Media team is responsible for setting up and managing all corporate charity accounts. New accounts should not be set up without the approval of this team.
2. All content posted on charity channels must be politically neutral, in line with Charity Commission regulations.
3. All charity accounts must be closely moderated, in order to make sure channels are a safe space for audiences and are in line with the charity's [community guidelines](#).
4. Moderators must signpost people with enquiries to relevant information, advice and support - in most cases via the charity website.
5. If staff need any advice or see posts that carry a reputational risk, contact/report the posts to SocialMedia@nas.org.uk.

Use of personal social media accounts

1. If staff use personal social media accounts to promote and talk about the charity's work (rather than autism generally), they must use a disclaimer such as: 'Views are my own' or 'opinions are my own' in the bio/about me section of their social media profile. However the use of such a disclaimer does not provide a defence against any breach of this policy or misuse of social media (see [community guidelines](#), Conduct Management Policy and the appropriate conduct sections below).
2. Staff should be aware of their association with the National Autistic Society and ensure their profile and related content is consistent with how they wish to present to themselves to the public and colleagues.
3. Never post or amplify any content that could be considered as disparaging or discriminatory against, bullies, harasses or defames, any individual or organisation. Staff should also avoid social media communications that might be misconstrued in a way that could damage the National Autistic Society's reputation, even indirectly.
4. Don't approach high profile people/celebrities from personal social media accounts to ask them to support the charity.
5. If staff are contacted by the media about social media posts that relate to autism or the National Autistic Society, contact press@nas.org.uk immediately.

4. Social Media Overview

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, Youtube and Instagram. In this policy, we also refer to use of blogs and personal websites as social media.

Why does the charity use social media?

Social media is essential to the success of communicating the National Autistic Society's work and engaging supporters, stakeholders, decision makers and the wider public. Many staff use social media in a personal capacity outside of work.

Why does the charity need a social media policy?

The boundary between a personal and professional opinion can be blurred on social media, particularly if staff are discussing issues relating to autism and the National Autistic Society's

work. This can particularly be the case for autistic employees who talk about their experiences publicly online.

While the charity encourages the use of social media, there are certain standards, outlined in this policy, which all staff are required to observe. Publication and commentary on social media carry similar obligations to any other kind of publication or commentary in the public domain.

Internet access and monitoring usage

Access restrictions to social media sites are restricted on most National Autistic Society devices, except where there is a job-related need in which case this will be agreed with the staff member's line manager and IT. Whenever using the internet at work, it is important that staff refer to our IT Policy. Staff are permitted to make reasonable and appropriate use of personal social media activity during lunch breaks. But usage should not be excessive and interfere with their duties.

Point of contact for social media

The PR and Social Media team is responsible for planning corporate social media activity and for the day-to-day publishing, monitoring and management of the charity's corporate social media channels. No other staff member can post content on the corporate channels without the permission of the PR and Social Media team.

For questions about any aspect of these channels, email socialmedia@nas.org.uk.

Corporate social media channels

The charity has a community of over 800,000 people across the main corporate accounts, covering:

- Facebook: <https://www.facebook.com/NationalAutisticSociety>
- Twitter: <https://twitter.com/Autism>
- Instagram: <https://www.instagram.com/nationalautisticsociety/>
- LinkedIn: <https://www.linkedin.com/company/40841/>
- YouTube: <https://www.youtube.com/user/NationalAutisticSoc>

Other channels in the charity:

- Facebook Scotland: <https://www.facebook.com/autismscotland/>
- Facebook Wales: <https://www.facebook.com/NASCymru/>
- Facebook Northern Ireland: <https://www.facebook.com/autismnorthernireland/>
- Facebook Fundraising: <https://www.facebook.com/NASTeamAutism/>
- Twitter Scotland: <https://twitter.com/AutismScotland>
- Twitter Wales: <https://twitter.com/NASCymru>
- Twitter Northern Ireland: <https://twitter.com/Nlautism>
- Twitter Press: <https://twitter.com/NASPressteam>
- Twitter Campaigns: <https://twitter.com/NAScampaigns>
- Twitter Fundraising: <https://twitter.com/NASFundraising>
- Twitter Autism Practice: <https://twitter.com/autismpractice>

For a full list of all the charity's social media channels, including volunteer-run branches, please email socialmedia@nas.org.uk

5. Using the corporate social media channels – appropriate conduct

Establishing, managing and staffing our social media channels

1. **Management** - The PR and Social Media team is responsible for setting up and managing the corporate social media channels. Only those authorised by the team will have access to these accounts.
2. **Working hours** - Corporate channels actively respond to enquiries Monday – Friday from 9.00am until 5.00pm. Please note, the team receive a high volume of enquiries, so it may take longer to respond to comments and enquiries during busy periods.
3. **Out of hours** - The PR and Social Media team monitor the corporate channels out-of-hours, as part of a duty rota, in case there is anything urgent that needs a response – either a risk to or opportunity for our charity. Due to capacity, the team does not respond to non-urgent social media enquiries out-of-hours.

The team provides a more comprehensive out-of-hours service in some circumstances. For instance, if there's an active campaign, such as World Autism Acceptance Week, a reputational crisis or if there's a high-profile media appearance or event.

4. **Additional charity social media accounts and channels** - New accounts, pages or groups should not be set up without the express approval of the PR and Social Media team. The team will work with staff to ensure that all plans social media channels have a clear purpose and that there is adequate resource in place to ensure that there is regular content, effective moderation, and consistent messaging with the wider charity. This will ensure all plans are effective and mitigate against potential safeguarding risks. If staff wish to create a page, please email socialmedia@nas.org.uk
5. **Inappropriate use** - Any misuse of social media (see [community guidelines](#), Conduct Management Policy and the sections below) or breach of this policy will be dealt with under our Conduct Management Policy and may be treated as Gross Misconduct, the outcome of which could be dismissal. In extreme cases, it could also lead to civil or criminal prosecution.

Quality and compliance

6. **Ensuring quality** - The social media team will provide oversight, but responsibility for ensuring content is accurate and compliant with this policy rests with the team developing content for social media channels.
7. **Permissions** – It's essential to make sure that anyone who is named or visible in an image being posting on the charity's social media channels has given explicit written permission (in the form of a signed permission form (email content@nas.org.uk) or, where that's not possible, email confirmation). Likewise, private information about any individual should not be shared without their express permission. Find out more in the [image policy](#) on the way the charity manages permissions and the storage of images, films and case-studies.
8. **Value** - The Press and Social Media team must ensure that all social media content has a purpose and a benefit for the National Autistic Society and accurately reflects the charity's mission, vision and values.
9. **Regulations** - All social media content must be in line with legislation and regulations affecting charity communications and operations more broadly, including those governing fundraising, health and safety, care and education safeguarding and quality, and political neutrality.

10. Political neutrality – All social media content must comply with [Charity Commission regulations and guidance](#), and [Electoral Commission guidance](#) and the *Lobbying Act* on non-party campaigning. The charity does not hold or promote views on party politics or have any affiliation with or links to political parties. It's OK to express views on policy, including the policies of specific parties, but the charity can't say anything that suggests it is telling people how to vote. From current Charity Commission regulations (CC9 Guidance):

“The key point is that whilst charities can attempt to influence public opinion on a particular issue if it furthers or supports their objectives, they must leave it to the electorate to make their own decisions about how to vote.”

This is important all year round and there are additional considerations to take during pre-election periods or referendums. This is known as *purdah*. For more information about this, see [Charity Commission guidance](#) or email the policy team: policy@nas.org.uk.

Protecting people's safety and well-being and the charity's reputation

11. Safety – All National Autistic Society supporters should be able engage with the content on the charity's channels in a safe manner. For the charity to do this, it's important to moderate posts and, on certain and rare occasions, 'hide', remove and/or report inappropriate content posted by other users, as explained in these [community guidelines](#). Inappropriate content could include, but is not limited to: abusive messages, offensive language, spam, harassment of any individual, hate speech.

12. Safeguarding – On some occasions, social media moderators will be contacted by users raising very serious issues about their own physical or mental wellbeing. On such occasions, moderators should follow the charity's safeguarding policy when deciding how to respond, whether it's recording, signposting or reporting an incident to the emergency services. This will ensure there is a consistent response across all channels. There is also an [urgent help page](#) on the website, directing people to wider crisis or emergency services.

13. Signposting – Like with safeguarding, it's important that users contacting charity social media channels are signposted to information, advice and support in a consistent way. There is information on the charity [Intranet](#) about how the information and services staff can signpost towards.

14. Complaints via social media – Should be acknowledged and escalated to YourViews@nas.org.uk, in line with the charity's [complaints policy](#).

15. Requests for personal information via social media – Should be acknowledged and escalated to dataprotection@nas.org.uk, in line with the charity's subject access request policy.

16. Reputation – Issues can escalate quickly on social media channels, potentially threatening the charity's reputation, its safe and compliant operation, the welfare of the people supported and staff. The PR and Social Media team monitor the charity's social media spaces for mentions of our charity, in order to catch any issues or problems early and identify the best response to prevent them escalating.

If any member of staff outside the PR and Social Media team become aware of any comments online that they think carry a reputational risk, whether on the charity's social media channels or on others, they should email SocialMedia@nas.org.uk immediately.

- 17. Responding to reputational threats, harassment, hate speech** - depending on the potential seriousness of the situation, the PR and Social Media team will:
- decide themselves what action to take
 - consult with the Managing Director of National Programmes and/or Director of Assurance and Compliance
 - seek external communication and/or legal advice about their response.

The aim of any response is to de-escalate a potentially damaging situation as quickly as possible and to limit harm to any individual concerned and the charity. Often it is best to not take any action, as this could in itself escalate or exacerbate the situation. At other times the team will act. This could include: responding to a comment, or hiding or blocking comments or individuals (see below). It could also include identifying the need for legal action by the charity or advising a third-party that they should seek advice about taking legal action, for instance in cases of harassment.

- 18. Blocking** - the PR and Social Media team reserve the right to ban or block users from any social media page, and to report content to the platform (ie Facebook or Twitter). This could include but not limited to the following: abusive messages, offensive language, spam, harassment of any individual, hate speech.

6. 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. Staff are expected to act appropriately and in ways that are consistent with the charity's values and Conduct Management Policy, both online and in real life. This expectation covers both public posts and private messaging on social media.

We reserve the right to monitor, intercept and review, without further notice, your activities using our IT resources and communications systems, including but not limited to social media postings and activities, for legitimate business purposes which include checking that you are meeting expected standards and investigating any unauthorised use of the systems. For further information, see our IT Policy.

Breaches of this Social Media policy may also constitute breaches of the Conduct Management Policy and may be treated as Gross Misconduct, the outcome of which could be dismissal. In extreme cases, it could also lead to civil or criminal prosecution.

Where staff are unclear about whether their personal social media activities are in line with this policy, they are encouraged to discuss with their line manager and, if necessary, seek input from the PR & Social Media team.

- 1. Staff who have personal social media accounts:** Be aware that any information staff make public could affect how people perceive the National Autistic Society. If staff are using personal social media accounts to promote and talk about the charity's work (rather than autism generally), it's important to be clear that they are speaking for themselves and not on behalf of the charity. In such cases, staff must use a disclaimer such as: 'views are my own' or 'opinions are my own' in the bio/about me section of their social media profile. However the use of such a disclaimer does not provide a defence against any breach of this policy or misuse of social media (see [community guidelines](#), Conduct Management Policy and the appropriate conduct sections of this policy).
- 2. Staff who have a blog or website:** Staff who have or wish to start a personal blog or website which indicates in any way that they work at the National Autistic Society

should discuss any potential conflicts of interest with their line manager, who should seek advice from the PR and Social Media team.

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 the National Autistic Society's view and must include a disclaimer in their bio (as in point 1 of this section).
4. **Use common sense and good judgement.** Staff should be aware of their association with the National Autistic Society and ensure their profile and related content is consistent with how they wish to present themselves to the public and colleagues. Careful consideration is needed as once something has been posted online, it is difficult to remove completely as it can be screenshot, shared or retweeted – even if the post is later deleted. Where staff have views or concerns about the National Autistic Society they are encouraged to consider using the internal routes for staff to share feedback, such as contacting their line manager, using the Staff Forum or, if appropriate, the whistleblowing service SafeCall.
5. **Approaching high profile people/celebrities:** The charity works with some high profile celebrities, journalists, politicians and major donors. Please don't approach high profile people from personal social media accounts to ask them to support the National Autistic Society, as this could affect potential or existing relationships with the charity. This includes asking for retweets about the charity. If staff have any information about high profile people that have a connection to autism or if there is someone they would like to support the charity, please email Socialmedia@nas.org.uk with more information.
6. **Interaction with supporters via personal/non corporate National Autistic Society accounts:** Staff should not interact or seek to interact on social media with people staff have come into contact with via their work at the charity – unless this is an important part of their job role and/or already agreed with their line manager and the Social Media team. It is understood and accepted that staff may already have friends who are supporters and/or there may be overlap between the people they come into contact with at work and who they engage with on social media (particularly for autistic colleagues and family members who frequently talk about autism on social media). This policy does not seek to stop that interaction and should not be a barrier to it.
7. **Interaction with the people supported, their families and carers on social media via personal/non-corporate National Autistic Society accounts:** Staff must not interact with the people the charity supports, their families or carers via their personal social media channels, unless this is an important part of their job and has been agreed with their line manager/PR and Social Media team. Any concerns about this, staff should please speak to their line manager and the Social Media team.
8. **Media:** If a staff member is contacted by the media about their social media posts that relate to autism or the National Autistic Society, they should contact press@nas.org.uk immediately with full details of the enquiry and under no circumstances respond directly.
9. **The National Autistic Society is a politically neutral organisation** and does not hold a view on party politics or have any affiliation with or links to political parties. When representing the National Autistic Society, staff are expected to hold the National Autistic Society's position of neutrality. Staff who are politically active in their personal time need to be clear in separating their personal political identity from the National Autistic Society, and avoid potential conflicts of interest. See point 1 of this section.

- 10. Never use the National Autistic Society's logos or trademarks** unless approved to do so. Permission to use logos should be requested from Content@nas.org.uk.
- 11. Always protect yourself and the charity:** staff should be careful with their privacy online and be cautious when sharing personal information. Anything staff publish is widely accessible and will be around for a long time, so do consider the content carefully. When staff use social media sites at work, it is important to do so safely. Staff can find more information on their responsibilities when using computer systems in the IT Policy.
- 12. Think about your reputation as well as the charity's.** Staff should avoid social media communications that might be misconstrued in a way that could damage the National Autistic Society's reputation, even indirectly. Express opinions and deal with differences of opinion respectfully. Staff must never post or amplify any content that could be considered disparaging or discriminatory against, bullies, harasses or defames, any individual or organisation. Passionate discussions and debates are fine, but staff should always be respectful of others and their opinions. Staff should not post any sexually explicit content or anything that breaches an individual or organisation's copyright or intellectual copyright or which invades their privacy on social media.
- 13. Staff are encouraged to share charity content.** When online in a personal capacity, staff might also see opportunities to comment on or support the National Autistic Society. Where appropriate and using the guidelines within this policy, staff are encouraged to do this as it provides a human voice and raises the charity's profile. If another user is critical of any charity content staff have amplified, it's recommended that staff don't engage and instead alert the social media team, who can respond where appropriate: Social.Media@nas.org.uk

7. 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 the National Autistic Society's 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 express 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 the National Autistic Society is not ready to disclose yet, such as a news story that is embargoed for a particular date.

Discrimination and harassment

Staff should not post content that could be considered disparaging or discriminatory against, or bullying or harassment of, any individual, on either an official National Autistic Society 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 links to such content 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.

To abide by the Lobbying Act, campaigning activities on social media must not be seen as intending to influence people's voting choice.

Use of social media in the recruitment process

Recruitment should be carried out in accordance with the relevant recruitment policy and associated procedures and guidelines. Any advertising of vacancies should be done through HR and the Marketing and Social Media team, who will advise on what is possible. In line with Keeping Children Safe in Education and the Safer Recruitment Guidance for the National Autistic Society, there will be a requirement to undertake reasonable online searches, as part of the due diligence on the shortlisted candidates. Please refer to the online searches guidance and safer recruitment guidance for further information.

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 also follow the National Autistic Society's safeguarding policy.

Under 18s and vulnerable people

Young and vulnerable people face particular 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 the National Autistic Society 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 National Autistic Society content and other content is appropriate for them. Please refer to our Safeguarding Policy.

Responsibilities and breach of policy

Everyone is responsible for their own compliance with this policy. Participation in social media on behalf of the National Autistic Society 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 the Conduct Management 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 their line manager and/or the Social Media team.

Public Interest Disclosure

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