Social Media Policy and Guidelines

Adopted 7ᵗʰ March 2024

Background

Malvern Hills Trust (MHT) recognises the numerous benefits and opportunities which a social media presence offers. MHT aims to build relationships and engage with the local community by sharing news, information, stories, achievements and the work we do to conserve the Hills and Commons and keep them open for the enjoyment of the public.

Social media is an essential part of the way in which MHT communicates the work of the charity. MHT will actively use social media in a variety of ways including engaging with local people to help them to understand our work, posting information relating to the future management of the Hills, providing information to help visitors and local people enjoy the Hills safely, and to network with other similar organisations.

MHT will actively encourage staff to make effective and appropriate use of social media platforms to engage in conversation with the local community and other external stakeholders. While encouraging the use of social media, there are certain standards, outlined in this policy, which must be complied with.

To provide clarity and consistency for staff, board members and volunteers, this policy has been put in place to guide the use of social media, whether personal or professional, when relating to MHT and the charity's work. Guidance on best practice and how to engage through social media will be provided by the Community and Conservation Officer (CCO).

This policy must be used in conjunction with related MHT policies including the Equality, Diversity and Inclusion Policy, Privacy Policy, GDPR regulations, Acceptable Use of Computer Resources policy (Staff handbook) and Board Code of Conduct. Others are included in the 'Other policies and laws' section. The policy will be included in the Staff and Governance handbooks for Staff and Trustees.

This policy has been written in line with guidance from the Charity Commission and the recommended template provided by CharityComms (as referenced by the Charity Commission).

This policy will be reviewed every three years. Reviews may be made sooner when necessary.

Scope of policy

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 include X (previously Twitter), Facebook, YouTube, Instagram and Pinterest.

This policy is intended for all MHT staff, volunteers and trustees and applies to content posted on both an MHT device and a personal device. The difference between a personal and professional opinion can be blurred on social media.

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

Publication and commentary on social media carries similar obligations to any other kind of publication or commentary in the public domain.

There are no current restrictions to any social media sites at the MHT office. However, when using the internet at work, staff should refer to the Acceptable Use of Computer Resources policy.

The CCO 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 CCO.

Trust Social Media Accounts

The Trust uses the following social media accounts:

Facebook www.facebook.com/MalvernHillsTrust - This is the main social media account of the Trust. Latest news stories and the charity's updates are posted this account.

X (Twitter) www.twitter.com/malvhillstrust - Short news stories and immediate updates are posted on Twitter. Third party content is regularly shared on this platform.

Instagram www.instagram.com/malvern_hills_trust - This account is the newest platform used by the Trust. It is used predominantly for sharing images and is in development with a small number of followers.

Access to social media and controls

The social media accounts are accessed and managed on a day-to-day basis by the CCO. The CCO responds to content and monitors social media accounts intermittently during office hours (typically from 9am to 5pm, Monday to Friday). Social media accounts are monitored very infrequently or not at all on evenings and weekends.

Passwords for social media accounts are kept securely. No other staff/trustees/volunteers have access without the CCO's permission.

The CCO is responsible for:

- Keeping up to date with technological developments
- Reviewing and updating all documentation relating to social media
- Delivering guidance and training on social media, including inductions for staff/trustees/volunteers
- Maintaining a directory of MHT social media accounts

- Posting content, monitoring, updating and editing content on social media accounts.
- Reviewing and moderating third party content and reporting to Line Manager/CEO/Chair if required

Line managers/CEO/Chair are responsible for:

- Addressing relevant concerns or questions regarding posts or comments on, or from professional and personal accounts
- Making decisions as to whether content should be deleted
- Creating content of a sensitive or high-profile nature
- Dealing with a social media crisis (see section 'Responding to third party content or incidents)
- Reporting outcomes, formal responses (off social media), or escalating the matter to involve external agencies where appropriate

Required conduct

Guidelines – Using MHT's social media channels

1. Content will be published by the CCO however, if other staff/trustees/volunteers wish to contribute to social media content they should speak to the CCO about this.
2. Staff/trustees/volunteers should ensure they always act in the best interest of the charity.
3. All social media content should have a purpose and a benefit for the Trust and accurately reflect the Trust's position.
4. Social media should bring value to the charity's audiences – answer questions, help and engage with users.
5. Staff/trustees/volunteers should take care with the presentation of content. Make sure that there are no typos, misspellings or grammatical errors and check the quality of images.
6. Staff/trustees/volunteers should carefully consider their content before posting. Respond to comments in a timely manner when a response is appropriate.
7. Staff/trustees/volunteers should check facts before posting particularly if sharing third party content. It should not automatically be assumed that material is accurate and reasonable steps should be taken where necessary to seek verification, for example by checking data/statistics and being wary of photo manipulation.
8. Be honest. Say what is known to be true or you have a good source for. If a mistake has been made, don't be afraid to admit it.
9. Staff/trustees/volunteers should refrain from offering personal opinions via MHT's social media accounts, either directly by commenting or indirectly by 'liking', 'sharing' or 'retweeting'. If in doubt about MHT's position on a particular issue, please speak to the CCO or CEO (depending on the type of content).
10. It is vital that MHT does not encourage others to risk their personal safety or that of others, to gather materials, for example a video of a stunt.

11. Staff/trustees 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.
12. Staff/trustees/volunteers should not set up other Facebook groups or pages, Twitter accounts or any other social media channels on behalf of MHT. This could confuse messaging and brand awareness. By having official social media accounts in place, MHT can ensure consistency of the brand and focus on building a strong following.
13. MHT is not a political organisation and does not hold a view on party politics or have any affiliation with or links to political parties. The Trust has the right to express views on policy, including the policies of parties, but cannot tell people how to vote.
14. If a complaint is made on MHT's social media channels, the CCO should seek advice from their line manager / CEO before responding when appropriate.
15. 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 incorrect statements posted by staff or misinformation around a current issue e.g. the erection of a giant wellington boot statue on Worcestershire Beacon at huge cost. The nature of social media means that complaints are visible and can escalate quickly. Not acting can be detrimental to the charity.

    MHT monitors other social media spaces for mentions of MHT to catch any issues or problems early. If there is an issue that could develop or has already developed into a crisis situation MHT will follow the steps identified in the Responding to third party content and incidents section.

    If any staff/trustees/volunteers become aware of any comments online that they think have the potential to escalate into a crisis, whether on MHT's social media channels or elsewhere they should speak to the CCO immediately.

Guidelines – Use of personal social media accounts

This policy does not intend to inhibit personal use of social media but instead flags up those areas in which conflicts may arise. MHT staff/trustees/volunteers are expected to behave appropriately, in accordance with MHT's policies, and in the best interests of the charity, both online and in person.

1. Be aware that any information made public could affect how people perceive MHT. You must make it clear that you are speaking for yourself and not on behalf of MHT. If you are using your personal social media accounts to promote and talk about MHT's work, you must use a disclaimer such as: 'The views expressed on this site are my own and don't necessarily represent MHT's positions, policies or opinions.'
2. Staff/trustees who have a personal blog or website which indicates in any way that they work at MHT should discuss any potential conflicts of interest with their line manager and the CCO. Similarly, staff who want to start blogging and wish to say that they work for MHT should discuss any potential conflicts of interest with their line manager and the CCO.

3. Those in senior management must take particular care as personal views published may be misunderstood as expressing MHT's view.
4. Use common sense and good judgement. Be aware of your association with MHT and ensure your profile and related content is consistent with how you wish to present yourself.
5. If a staff member/trustee/volunteer is contacted by the press about their social media posts that relate to MHT, they should under no circumstances respond directly. They should notify the CCO at the earliest opportunity.
6. MHT 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 MHT, staff and trustees are expected to hold MHT's position of neutrality. Staff and trustees who are politically active (in their spare time or in other positions) need to be clear in separating their personal political identity from MHT and understand and avoid potential conflicts of interest.
7. Never use MHT's logos or trademarks unless approved to do so. Permission to use logos should be requested from the CCO.
8. 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 consider the content carefully. Even deleted content may remain. 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 MHT computer systems in the Acceptable Use of Computer Resources policy.
9. 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.
10. We encourage staff/trustees/volunteers 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 MHT and the work we do. Where appropriate and using the guidelines within this policy, we encourage staff/trustees/volunteers to do this as it provides a human voice and raises our profile. However, if any content is controversial or misrepresented, please highlight this to the CCO who will respond as appropriate.

Guidance – Use by third parties

MHT encourages commenting and engagement by the public on social media channels however, we do have some guidelines that we ask users to follow:

1. Be respectful of other people's opinions. Please do not use profanity, offensive or defamatory statements or illegal content.
2. Comments that include bullying, advertising or those that are considered as spamming will be removed where possible. Spamming is the posting of unrelated content or regularly posting duplicate posts or comments. In extreme circumstance, the user may be blocked from commenting.
3. We encourage users to 'flag' on Facebook or 'report' on X (formerly Twitter) any posts that they think are inappropriate.

Guideline – Responding to third party content or incidents

Third party comments on MHT's social media pages can come in several different forms and should each be addressed differently. Each comment or engagement will be dealt with on an individual basis and for its own merits.

Best practice is to respond to every comment. Ignoring a negative comment is unlikely to resolve the situation and so should be responded to appropriately.

The following guidelines have been published by Comms Creatives and are included to assist staff when making decisions about how to respond to different types of engagement.

Type of engagement	Action	Who	Next steps
Complaint	• Answer their questions. Provide as much information as possible • If this is a current topic, perhaps publish more information on website and link to it for similar comments	CCO	Follow up with staff for further information. Create a 'latest news' article or position statement on website
Query	• Answer their questions. Provide as much information as possible. • Speak to colleagues to ensure the information is correct and up to date if unsure.	CCO / other staff to provide information as requested	If the answer is not known immediately, post this and then respond when you have the answers.
Compliment	• Thank them. • If appropriate, ask if MHT can use/share their comments	CCO	Pass on to staff as praise about the work of MHT
Chat	• Engage in a conversation and find out more about their experience	CCO	
Attack	• Offer to help or apologise for how they feel. • Speak to line manager for advice or report to CEO if concerned about content (possibly discriminatory etc).	CCO / Line Manager / CEO	Ask sender to direct message or email in
Spamming	• Ignore. Do not respond	CCO	Block persistent abusers from commenting / accessing MHT social media accounts.

Crisis Management Plan

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. An example of a crisis may be a large negative reaction online or viral spread of misinformation:

In these situations, the Crisis Management Plan may need to be enacted.

- Staff/trustee/volunteer to immediately report issue to CCO and CEO. The staff/trustee/volunteer should not respond to the comment.
- CEO to determine whether the post on the Trust's account should be deleted or responded to bearing the following in mind:
  Decision to Delete:
  - The post should be deleted if it is illegal, discriminatory, confidential, contains personal information or is a breach of staff/trustee/volunteer policies.
  - The post will be deleted by the CCO if requested by the CEO.
  - If deleted, a statement should be posted on social media to clarify the situation for example "We have removed a post which contained offensive information. We apologise for any offence caused and are reviewing our policies relating to the content we post on social media." Or "We have removed a post on our social media which contained offensive statements. We will not tolerate hateful messages or behaviour."

  Decision to Respond:
  - If the post is to be responded to, the CEO should work with CCO to create an immediate response, for example "Thank you for your comment. This is currently being investigated and we will share more information in due course." Or "We have recently been made aware of a post on social media regarding a potential issue and are currently looking into this. An update will be provided shortly."
  - CEO to work with the CCO to provide an official statement which explains the situation and provides detail. Further information relating to the topic may be linked to from the social media account e.g. to the MHT website with a detailed description of the incident / background / MHT's position.
- Should the CCO be unavailable, the CEO will log into the social media accounts to delete or publish the response as required.
- For content on third party pages or groups, posts cannot be deleted by MHT. The CCO may request the removal of the post/content from the groups, or respond with an agreed statement on their page/group.
- The CEO will notify staff/trustees/volunteers to the issue at the earliest opportunity asking staff/trustees/volunteers to only respond with the official response provided by the CEO.
- All non-urgent scheduled MHT social media posts will be postponed until after the incident or until an appropriate time.
- CEO will determine whether the post should be reported to relevant authorities for example the police, other regulators or report a serious incident to the Charity Commission. The CCO will report offending posts to the relevant social media platform as required.

- CEO to continue to update staff/trustees/volunteers with the current situation and any resolutions.
- Review and update the social media policy in light of the incident.

Other relevant policies and laws

Libel

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

Copyright law

It is critical that all staff/trustees/volunteers 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/trustees/volunteers make in a personal capacity must not breach confidentiality. For example, information meant for internal use only or information the MHT is not ready to disclose yet. For example, a news story that is embargoed for a particular date. Please refer to the Staff and Governance Handbooks for further information.

Discrimination and harassment

Staff/trustees/volunteers should not post content that could be considered discriminatory against, or bullying or harassment of, any individual, on either an official MHT 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

This is in line with MHT's Equality and Diversity Policy.

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. During these periods, all campaigning activity will be reviewed by the CEO.

Use of social media in the recruitment process

Recruitment should be carried out in accordance with the associated procedures and guidelines. Any advertising of vacancies should be done through the CCO. Vacancies are shared on Facebook and Twitter.

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.

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/trustee considers that a person is/people are at risk of harm they should report this to the CEO 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, having sensitive or personal information on their profiles, or becoming targets for online grooming.

Where known, when communicating with young people under 18-years-old via social media, staff/trustees should ensure the online relationship with MHT follows the same rules as the offline 'real life' relationship. Staff/trustees 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/trustees should ensure that the site itself is suitable for the young person and MHT content and other content is appropriate for them. Please refer to the Safeguarding Policy.

Responsibilities and breach of policy

Everyone is responsible for their own compliance with this policy. Participation in social media on behalf of MHT is not a right but an opportunity so it must be treated seriously and with respect. For staff and trustees, breaches of policy may result in disciplinary action depending on the severity of the issue. Please refer to the Staff Handbook and the Governance Handbook for further information on trustee disciplinary procedures. Staff/trustees/volunteers who are unsure about whether something they propose to do on social media might breach this policy, should seek prior advice from the CCO.

References

Charity Commission – [Charities and social media and checklist for developing a social media policy](#)

Charity Comms – [Social media policy template for charity](#)

Creative Comms – [Answering comments on social media](#)

Hootsuite – [Dealing with a social media crisis](#)

Somerset Wildlife Trust - https://www.somersetwildlife.org/policies/social-media-policy

Policy review

This social media policy has been produced and approved by the Board. Should there be any questions relating to this policy, they should be referred to CCO/CEO/Chair.

This policy will be reviewed every three years. Reviews may be made sooner as required.

Next review date: February 2027