

## **Wesley House, Cambridge**

### **SOCIAL MEDIA 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 of social media include Facebook, Twitter, LinkedIn and Instagram. In the context of this policy, group emails are not within the definition of social media, though the principles of relevance and ethos apply in emails too.

The difference between a personal and professional opinion can be blurred on social media, particularly if you're discussing issues relating to Wesley House'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 sets out guidelines on how social media should be used to support the delivery and promotion of Wesley House, 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 accounts, while protecting the charity and its reputation and preventing any legal issues.

This policy document has been written to comply with the Charity Commission's requirements published in September 2023 at [www.gov.uk/government/publications/charities-and-social-media/charities-and-social-media](http://www.gov.uk/government/publications/charities-and-social-media/charities-and-social-media).

#### **Scope**

This policy applies to all staff, volunteers and trustees (collectively referred to as "staff" in this policy), and applies to content posted on both a Wesley House device and a personal device. Before engaging in work-related social media activity, staff must read this policy.

#### **Policy statement**

Wesley House uses Social Media to raise the profile of our work, foster connections with those who support our work, promote student and staff recruitment, and to support fund raising.

Wesley House's social media posting and sharing must always comply with Wesley House's charitable purposes and be consistent with the published ethos statement.

Wesley House social media must not be used to post or share content that is harmful, inconsistent with our charity purpose, not in Wesley House's best interests or is in breach of the law.

All Wesley House social media posting or sharing must comply with relevant laws including concerning data protection, privacy, copyright law, defamation law, whistleblower protection and equality and human rights laws. This includes getting permission from individuals before sharing images on social media.

Breaching this policy may be considered a disciplinary offence.

## Audiences

Wesley House uses social media engage with a wide range of people who are interested in what we say and do. This includes:

- Current and prospective students
- Alumni
- Donors
- Those interested in attending our courses and events
- Members of the Cambridge Theological Federation and partner universities
- Organisations with similar/related purposes (eg in the Methodist Church worldwide, those working in the field of Faith in Public Life)
- Staff

## Our social media accounts

Wesley House uses the following social media accounts:

Platform	Address	Administrators
Facebook	<a href="http://www.facebook.com/wesleycambridge">www.facebook.com/wesleycambridge</a>	Richard Davis, Jane Leach, Alastair Oatey
Facebook	<a href="http://www.facebook.com/holinessjournal">www.facebook.com/holinessjournal</a>	Alastair Oatey
X/Twitter	<a href="https://twitter.com/wesleyhousecam">twitter.com/wesleyhousecam</a>	
Instagram	<a href="https://www.instagram.com/wesleyhousecam">www.instagram.com/wesleyhousecam</a>	
Threads	<a href="https://www.threads.net/@wesleyhousecam">www.threads.net/@wesleyhousecam</a>	
LinkedIn	<a href="https://www.linkedin.com/company/19596178">www.linkedin.com/company/19596178</a>	

New social media accounts must not be set up without agreement from the Senior Management Team and should not be used before this document is updated.

## Private Community Groups

Wesley House has one private community group set up through WhatsApp. It is the Wesley House Group and the administrator is Richard Davis.

The administrator's role is:

- adding and removing members
- reviewing messages to ensure they comply with Wesley House's ethos statement and take action when they do not (eg countering unacceptable comments and ensuring they are deleted)

## Unofficial accounts

There are Social Media not set up by staff over which Wesley House has no control (eg a cohort of students). They therefore are not governed by this policy, though we expect anyone with a formal connection to Wesley House (eg students) to behave in accordance with the ethos statement.

Examples include the Leaderwise Staff WhatsApp group, the PHD Class AU/Wesley House WhatsApp group (Admins: David Baraza, Anastacio Chembeze, Dikonzo Mwepu), and WhatsApp groups set up by people living on the same floor of accommodation.

## **Responsibilities**

The Principal has overall responsibility for Wesley House's communications.

The Business Director is responsible for the day-to-day monitoring and management of our social media accounts and for setting up users.

The authorised users who may publish on Wesley House's Social Media accounts are:

- Jane Leach, Principal
- Richard Davis, Vice Principal
- Priscilla Garcia, Post-Doctoral Research Associate
- Alastair Oatey, Business Director.
- Medi Volpe, Director of Research

All authorised users may publish day to day content about Wesley House's work and those closely associated with us (eg students and visitors).

The Principal and Vice Principal are authorised to publish comments giving Wesley House's view on events in the news.

All authorised users are responsible for ensuring this policy is being followed and must act if it is breached, including inadvertently (eg sharing material that turns to be in copyright). See "when things go wrong" for further details.

No individual may post sensitive information about the College's internal business or commercially sensitive information without approval of the Executive Committee. Such information, if it is to be made public, is likely to be the subject of an approved press release.

## **Training**

Staff will be deemed to have the skills and knowledge necessary to use social media appropriately from reading this policy. Anyone who wants to improve their social media literacy can read material available at [www.gov.uk/guidance/online-media-literacy-resources](http://www.gov.uk/guidance/online-media-literacy-resources) [mediatrust.org/communications-support/resource-hub](http://mediatrust.org/communications-support/resource-hub)

## **Access**

Access to the Facebook pages is managed by one of the administrators giving others access using their personal Facebook IDs.

Access to other Social Media is through a shared username and password. Our policy is to change the password on shared accounts whenever someone leaves our employment or immediately if there is ever an incident.

## **Third Party content**

Our policy is to interact with third party content that is relevant to Wesley House's purposes or to the purposes of those we are engaging with (as listed above) if it is appropriate to do so and is not inconsistent with this policy. This includes liking and sharing appropriate content such as partner organisations' events.

It is intended that engaging with third party content is occasional. There is no intention to share everything a partner publishes and there are not resources to monitor third party accounts frequently to find content to share.

## **Monitoring**

Wesley House's social media is checked on an "as and when" basis and so any authorised user is encouraged to check and respond to social media as well as to post information there. Our intention is to monitor the main Facebook and X/Twitter accounts daily during office hours.

Wesley House does not routinely monitor personal social media accounts, though reserves the right to act on information posted on social media by staff.

## **When things go wrong**

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: safeguarding concerns or accusations of plagiarism. The nature of social media means that complaints are visible and can escalate quickly. Not acting can be detrimental to the charity.

## **Complaints and criticism**

Our policy is to respond where appropriate to complaints and criticism made through social media. This will be a judgement call based on the details of each incident and needs to take into account harm that will be done either by responding, and so escalating an issue, or not responding, and so letting others drive the agenda. Normally we expect to give a short explanation where possible and refer users to contact us by email where a fuller one-to-one response can be given.

If a complaint is made on Wesley House's social media accounts, you should seek advice from the Principal before responding. If she is not available, then you should speak to the Vice Principal.

## **Incidents**

The following process applies if there is a breach of this policy or if content posted or shared by Wesley House risks significantly damaging our reputation (described for the purposes of this policy as "inappropriate content"). All authorised users are authorised to amend and delete Wesley House Social Media posts.

1. Anyone who finds inappropriate content must inform an authorised user as soon as possible.
2. An authorised user should take a screenshot of the inappropriate content and then amend or delete the post.
3. The authorised user must report the action taken to the Senior Management Team, sending a copy of the screenshot. ("SMT": Principal, Vice Principal, Business Director).
4. The SMT will decide whether any corrective action needs to be taken, including making public statements. Any decision not to make a statement will be balanced against the risks of not doing so.
5. The SMT will decide whether an incident needs to be reported to trustees and whether to an individual (eg the Chair), a group (eg the Executive) or the full Trustees. Each case will be judged on its own merits and the level of risk to Wesley House's reputation and/or business.
6. The SMT will decide whether a serious incident needs to be reported externally, by whom and by when.
7. The SMT will decide if any action needs to be taken against the user (eg banning, blocking).
8. The SMT will decide whether any disciplinary action needs to be considered.
9. If the breach involves a Trustee, the Chair of Trustees (or Chair of F&GP if it involves the Chair) will manage any conflicts of interest, for example asking them to leave the meeting where a response is discussed.

### **Reporting incidents**

Incidents that cause significant harm or loss to Wesley House or its beneficiaries must be reported to the Charity Commission. See [www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity](https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity)

Publishing certain content can result in a criminal offence and so must be reported to the police. Examples of criminal offences include communications which constitute hate crime or are malicious, threatening, indecent or grossly offensive.

Incidents may need to be reported to partners whose reputations may be also at risk (eg University partners).

Incidents may need to be reported to the social media platform.

### **Abusive messages**

If we receive abusive messages on social media we will treat them as inappropriate content and follow the incident procedure above. In addition we will review what additional support we can provide, if required, for staff to deal with abuse targeted towards them or their work.

### **Fake accounts**

The sites below contain information for dealing with inappropriate content created from fake accounts.

[www.ncsc.gov.uk/guidance/social-media-protect-what-you-publish](https://www.ncsc.gov.uk/guidance/social-media-protect-what-you-publish)

[www.ncsc.gov.uk/guidance/social-media-how-to-use-it-safely](https://www.ncsc.gov.uk/guidance/social-media-how-to-use-it-safely)

### **Hacked accounts**

You should inform the Senior Management Team if your accounts are hacked as this may have an impact on messages that purport to come from you but breach this policy. Disciplinary action would not normally be appropriate in such circumstances, provided that you have informed us as soon as possible after discovering the hack.

## **Appropriate Conduct Guidelines for using Wesley House's social media accounts**

1. When posting on our social media accounts you must ensure you uphold Wesley House's ethos statement at all times.
2. Make sure that all social media content has a purpose and a benefit for Wesley House, and accurately reflects Wesley House's agreed position.
3. Assess the risk of posting about wider issues. Be satisfied that posting is a proper use of resources (as assessed by the Charity Commission) and that the potential benefits outweigh those risks.
4. Bring value to our audience(s). Answer their questions, help and engage with them.
5. Take care with the presentation of content. Make sure that there are no typos, misspellings or grammatical errors. Also check the quality of images.
6. Always pause and think before posting. That said, reply to comments in a timely manner, when a response is appropriate.
7. You shouldn't post content about individuals without their express permission. If you are sharing information about individuals or third party organisations, this content should be clearly labelled so our audiences know it has not come directly from Wesley House. If using interviews, videos or photos that clearly identify a child or young person, you must ensure you have the consent of a parent or guardian before using them on social media.
8. Always check facts. You 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.
9. 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.
10. You should refrain from offering personal opinions via Wesley House's social media accounts, either directly by commenting or indirectly by 'liking', 'sharing' or 'retweeting'. If you are in doubt about Wesley House's position on a particular issue, please speak to the Principal or in her absence the Vice Principal.
11. It is vital that Wesley House does not encourage others to risk their personal safety or that of others, to gather materials. For example, to take a good photograph.
12. You 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.
13. Wesley House 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 (see below for guidance).

### **Guidance on political activity**

Any political activity on social media must comply with the regulations at [www.gov.uk/guidance/political-activity-and-campaigning-by-charities](http://www.gov.uk/guidance/political-activity-and-campaigning-by-charities).

There are additional rules during elections: [www.gov.uk/government/publications/speaking-out-guidance-on-campaigning-and-political-activity-by-charities-cc9/charities-elections-and-referendums](http://www.gov.uk/government/publications/speaking-out-guidance-on-campaigning-and-political-activity-by-charities-cc9/charities-elections-and-referendums)

## **Appropriate Conduct Guidelines for use of personal social media accounts**

Staff have the right to exercise their freedom of expression within the law in their communications, including when using social media. This includes personally supporting a particular political party or (during an election) a particular candidate:- something a charity cannot do. However, there is a risk that content posted by individuals in their personal capacity might be associated with the charity.

This policy does not intend to inhibit personal use of social media but instead flags up those areas in which conflicts might arise. Wesley House staff are expected to behave appropriately, and in ways that are consistent with Wesley House's ethos statement and policies, both online and in real life.

1. Be aware that any information you make public could affect how people perceive Wesley House. You must make it clear when you are speaking for yourself and not on behalf of Wesley House. If you are using your personal social media accounts to promote and talk about Wesley House's work, you must use a disclaimer such as: "The views expressed on this site are my own and don't necessarily represent Wesley House's positions, policies or opinions." However, having a disclaimer does not prevent the following guidelines from applying.
2. Staff who have a personal blog or website which indicates in any way that they work at Wesley House should discuss any potential conflicts of interest with their line manager (which for a Trustee will be the Chair of Trustees). Similarly, staff who want to start blogging and wish to say that they work for Wesley House should discuss any potential conflicts of interest with their line manager.
3. Those in senior management, and specialist roles where they are well known in their field of expertise (ie all academic staff), must take particular care as personal views published may be misunderstood as expressing Wesley House's view.
4. Use common sense and good judgement. Be aware of your association with Wesley House and ensure your profile and related content is consistent with how you wish to present yourself to those we engage with, as listed earlier in this document. In particular, think about the impact of what you disclose about your personal life will have on those you interact with professionally (eg prospective and actual students), particularly if they are under your authority.
5. If you are contacted by the press about your social media posts that relate to Wesley House, you should talk to the Principal immediately and under no circumstances respond directly.
6. Wesley House 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 Wesley House, staff are expected to hold Wesley House's position of neutrality. Staff who are politically active in their spare time need to be clear in separating their personal political identity from Wesley House, and understand and avoid potential conflicts of interest.
7. Never use Wesley House's logos on personal accounts unless approved to do so by your line manager.
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 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 IT 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 to share our social media posts. When online in a personal capacity, you might also see opportunities to comment on or support Wesley House 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. It is not necessary to add additional disclaimers when sharing other people's posts.

## **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 Wesley House 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 Wesley House is not ready to disclose yet. For example, a news story that is embargoed for a particular date.

### **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 Wesley House social media accounts 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.

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

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 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 considers that a person/people is/are at risk of harm, they should report this to their line manager 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 Wesley House 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 Wesley House content and other content is appropriate for them. Please refer to our Safeguarding Policy.

### **Responsibilities and beach of policy**

Everyone is responsible for their own compliance with this policy. Participation in social media on behalf of Wesley House 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 Handbook 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.

### **Public Interest Disclosure**

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

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