SOCIAL MEDIA POLICY

1) **Purpose**
   a) There are more than 200 well-established social media platforms in the world however by far the most popular in the UK are YouTube, Facebook, Twitter, LinkedIn, Instagram, TikTok, Pinterest and SnapChat.
   b) Social media give us a great platform to speak to and listen to our stakeholders, give them insight into the work we do and promote our services to new audiences.
   c) We use social media platforms to allow us to engage in two-way communication in a transparent way.
   d) For the purpose of this policy only the major social media platforms will be referred to by name, however the policy and the governance arrangements apply to the use of all forms of social media.

2) **Overriding principals**
   a) Everything we do on social media, from the creation of accounts, to the messages and interactions we have on them, are there to showcase our services, document our work and celebrate our stakeholders.
   b) Platforms will be used to start or join into online conversations with our stakeholders and the general public.
   c) Our social media approach builds on our values and present us in a way that maintains a positive outlook and must never be used as a tool to spread a negative or controversial message.
   d) Right first time – mistakes can easily be rectified however users must do their best to ensure social media activity is accurate, professional, understandable and purposeful.
   e) Common sense and discretion - ETT staff are trusted to use good judgement and make sound decisions on what they post, referring to this policy and to the Chief Executive for advice and support if unsure.
   f) Reach – social media has the potential to reach a large number of people at the click of a button so our posts will always be seen by someone.
   g) Innovation – social media and the availability of mobile technology frees users up to be creative in their approach to engaging our stakeholders and this will always be encouraged and supported.
   h) Know our business – our stakeholders expect us to be responsive and to be able to answer queries accurately. Staff must only post about aspects they have thorough knowledge of or in which they currently work.

3) **Our use of Social Media**
   a) We use social media to build our business profile.
   b) We must understand who our followers are, their interests and concerns posting only information that may be of interest and relative to them.
   c) Responsibility and ownership for accounts and their content ultimately rests with the Chief Executive.
   d) There are 4 main purposes for any social media activity (not hierarchical):
      i) To document our work, reinforcing our reputation and professionalism.
      ii) To showcase our knowledge and expertise.
      iii) To promote our services and attract interest of potential new stakeholders.

iv) To publicly celebrate and support the achievements of our learners, employers and other organisations within our sector.

4) Categories of account

a) Social media is so widespread in society that it is accepted that many ETT staff will have their own individual accounts, some where they choose to be open about their affiliation with ETT and some where they choose not to identify at all with ETT.

b) For clarity, when setting out standards, expectations and governance this policy will refer to 3 categories of social media account:

i) **Official**. These social media accounts are the ETT main social media channels and messages and content issued on them represent the official view or comment from ETT. There is only one official account for each social media platform and these accounts are managed primarily by the CEO on behalf of the business. These accounts are where the general public, stakeholders and media can expect to hear the latest Blog, comment and insight into our work.

ii) **Individual-professional**. These accounts are those where a member of ETT staff clearly identifies themselves as working for the business. Staff will be trusted to act appropriately in accordance with the guidance set out in this document and all other standards of professional conduct when using social media. These accounts are for individual staff members to network, collaborate, discuss and publicly support subjects relevant to our work and/or their professional role within our sector.

iii) **Individual-personal**. These accounts are those where individuals do not identify themselves as working for ETT. Staff are free to use social media just like anyone else, within the confines of other codes and regulations which apply to them within any other company policy and procedure. These accounts are controlled solely by the individual user and all content posted from them is that person's responsibility. For those using social media platforms which only allow one profile or account per individual, for example Facebook, where secondary 'fake' profiles breach its terms and conditions, users should only identify working for ETT if they comfortable doing so.

5) Account ownership

a) ETT owns all official social media accounts just as it does all its other assets. Official accounts are the voice of the organisation and not the voice of individuals with access to the account.

b) To retain ownership and control over social media assets, the Chief Executive will retain all master passwords to each official social media account

c) Individual users will only be given access to these accounts.

6) Social media management

a) Protecting the individual – each user will receive guidance and training on how to set up each social media account. It is important that no one can ever post without ETT being able to identify who the author was – whether that is for recognition of a great post, feedback to help them improve, or a disciplinary matter.

b) Protecting ETT – to retain ownership and control of a social media account as few people as possible should have access to master passwords. It is important that social media accounts are protected and professionally administrated just as other channels of communication are.

c) Governance – ETT will monitor what content is posted and support staff on how to get the best out of the account. Any posts that breach the rules and guidance within this document will be dealt with as a disciplinary matter.

d) Everyone's responsibility - there can often be an over-reliance on one or two individuals to provide all the content – we will try as far as possible to share the responsibility with everyone in the business.

e) Scheduling – to best support staff, ETT will use some pre-scheduled, pre-written posts at key times of the day.

f) Analytics and reporting – we will periodically prepare reports for users, the Chief Executive and Trustees to show performance and engagement levels. This also aids governance, best practice and evaluation of social media activity effectiveness.

7) Posting & Content Creation

a) Content in the form of text will be the responsibility of the author of the post.

b) Images can be supplied by ETT HQ which will be high quality.

c) Any social media graphics will be produced as part of wider campaign and made available for staff to use.

d) Photographs taken by account users must be appropriate for use first time round and will not be edited. Likewise, videos must be taken in a way which requires little or no editing. GDPR legislation should be complied with at all times.

e) Permission of all individuals and premises featuring in images or videos must be sought before posting and this permission documented by the person taking the photograph.

f) Images, designs, graphical representations and any other creative works (including GIFs and Memes) should not be sourced from search engines such as Google and put on social media as doing so may be in breach of Copyright. Staff are responsible for checking the terms of use for each image sourced.

g) Staff must not;
   i) post or promote content which harasses, bullies or otherwise intimidates
   ii) post or promote content which instructs, causes or coerces others to harass, bully or otherwise intimidate
   iii) post or promote content intended to incite violence or hatred
   iv) post or promote abusive content relating to an individual's age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion or belief, sex or sexual orientation.

h) Content posted or promoted on Official or Individual-professional accounts must be respectful of others and courteous and must not be used to criticise or argue with colleagues, learners, employers, partners or competitors.

i) When posting on an account, it is vital to have legal considerations in mind (see section below). This includes, but is not limited to, ensuring that posts do not breach confidentiality, make defamatory comments or breach copyright. Communications through social media must not;
   i) include confidential information about an individual or organisation
   ii) discuss ETT internal workings or reveal future plans that have not been communicated to the public
   iii) use someone else's images or written content without permission and/or without acknowledgement

8) Reading and replying

a) Social media is a two-way engagement, not broadcast and ignore

b) Official accounts will be monitored for inbound messages and our aim is to reply as quickly as possible. 1 working day is our maximum response time.

c) Individual-professional accounts must also be monitored in the same way with an identical maximum response time.

d) It is our aim to read and reply to every comment.

9) Dealing with complaints

a) Complaints should not be resolved by continuing the conversation over social media, unless they are of a low-level.

b) If a complaint is lodged via an Official or Individual-professional social media account, the person should be directed to lodge the complaint via email to info@theengineeringtrust.org. This is easily done by replying to them with the email address highlighted.

c) Details of the complaint remain secure and dealt with in a professional and timely manner.

d) Alternatively, the conversation can be taken privately to direct message, if the complainant insists on staying on social media rather than complaining via email.

10) Dealing with trolls

a) Comments from members of the public which are negative, disparaging, critical or offensive.

b) We are keen to join into and allow discussion on our social media channels – we are happy to deal with constructive criticism, healthy debate or challenge. Our replies to these should be respectful, professional and reflect our official position on the matter being debated.

c) Trolls are different to people with honestly held beliefs or valid criticisms and seek to provoke individuals and organisations into engaging with them in a public forum like social media in order to offend or damage reputations.

d) Trolls should be ignored and if this is done, on most occasions they will be closed down by other people, as social media can be self-regulating.

e) Any comments which cross the line into using bad language, posting offensive images, inciting any form of crime or disorder, or making any comments or allegations which constitute bullying, a hate crime or defamation/libel should be flagged immediately with the Chief Executive.

f) Action will be proportionate to the behaviour but may include blocking the individual, reporting them to the social media platform they are using, or, in the most serious cases, bringing to the attention of police or other enforcement organisations.

g) The person reporting this behaviour should seek to capture an image of the offending post as evidence.

11) Dealing with an incident in our wider business

a) In the event of an incident, such as an accident at an employer or a serious safeguarding allegation that enters the public domain, it is important that the Official and Individual-professional accounts and other online channels are controlled and measured in our response or the information given out.

b) In this instance only the Official accounts should post information and, if necessary, Individual –professional accounts will be suspended. These accounts will be reactivated once the incident has been resolved.

c) Our aim is to ensure that the public, stakeholders and news media can quickly and easily identify important communications and to ensure staff do not unwittingly post something inappropriate or inaccurate or prejudice the incident investigation in any way.

12) Dealing with media enquiries

a) Journalists may approach ETT via its social media accounts to search for potential news stories – both positive and potentially negative.

b) Staff should not engage in direct conversations with journalists over social media as this may lead to them being directly quoted without warning from the journalist. Please push all enquiries to email our info@theengineeringtrust.org for an official comment.

13) Accountability & Responsibilities – who does what?
a) Each staff member of our Official or Individual-professional or their individual-personal social media account is responsible for the messages they post and accountable for them.
b) The Chief Executive oversees and monitors Official accounts and will intervene in the event of a post which is damaging to ETT's reputation or is misleading or offensive.
c) Individual-professional and individual-personal accounts are not administrated or overseen by the Chief Executive therefore responsibility for account security, proper use, replying to inbound messages, deleting messages etc. rests with that individual.

14) Frequency of use
a) Social media accounts are no longer broadcast channels and increasingly social media companies are refining them to ensure that two-way engagement and content which is hyper relevant to customers is made most visible. This means that our accounts should post often (several times a day) with information that is timely and relevant.
b) Staff will share this responsibility out so that content is posted throughout the week - social media accounts can quickly become flat and stale if left unused and can lose followers, so regular use is vital.

15) Branding
a) Official accounts should have the ETT logo as the main image so that they are clearly identifiable to stakeholders and the public. A secondary image using our photography should be used.
b) Individual-professional accounts should contain the staff name and role so that stakeholders and the public can be confident that they are a legitimate social media account. The user's photo should also be used to further strengthen the link between the account's purpose and their role within ETT. Their bio should state their role and contain the words 'Views are my own.'
c) Individual-personal accounts should not contain the ETT logos or other branding.

16) Media law
a) All ETT social media content is covered by British media law and the same rules apply as they do to the news media and the general public.
b) The main legislation users must be aware of are:
   i) Defamation: posting untrue content adversely affecting a person's or organisation's reputation, which has caused, or is likely to cause, harm
   ii) Malicious falsehood: posting untrue and damaging content with an improper motive, resulting in financial loss for the subject
   iii) Harassment: subjecting someone to a course of conduct that causes them distress or alarm, including stalking, trolling and cyber-bullying
   iv) Intellectual property infringement: posting content which copies a substantial part of a work protected by copyright
   v) Breach of confidence: posting confidential information. ETT Data Protection Policy details how information assets should be classified and treated.
   vi) Malicious Communications Act 1988: prevents conveying a threat, a grossly offensive or indecent message or false information with the intention to cause distress or anxiety to the reader or recipient.

vii) Section 127, Communications Act 2003: prevents the use of public electronic communications equipment to send a message that is false, grossly offensive, or of an indecent, obscene or menacing character, whether received by the intended recipient or not.

viii) Computer Misuse Act 1990: prevents the unauthorised access, modification and use of computer material or the use of a computer to assist in a criminal offence, including accessing confidential information and thereby impersonating another person through social media.

ix) Prevent Duty Guidance (from Section 26(1) of the Counter-Terrorism and Security Act 2015): requires ETT to have due regard to the need to prevent people from being drawn into terrorism.

x) The Public Sector Equality Duty (Section 146 of the Equality Act 2010): requires ETT to have due regard to the need to eliminate unlawful discrimination, including bullying, harassment and victimisation; to promote equality of opportunity between different groups; and to foster good relations between different groups.

17) Compliance / governance

a) Under-use of accounts. ETT will audit usage and any user staff member who does not post anything at all in a three-month period will be advised to close their profile.

b) Damaging or inappropriate posts. The Chief Executive will identify and contact the author responsible for any post deemed damaging or inappropriate and explain why it needs to be edited or deleted. If the author cannot be immediately reached the post will be deleted or edited (if possible). Every effort will be made to educate the author as to the reasons behind the decision and what to do or not do next time.

c) Individual account users remain in sole control of their account but if inappropriate or damaging posts appear on their account the individual will be contact and asked to amend or delete it and further action may be taken if it is deemed necessary.