

Social Media Policy

Introduction and Purpose

Social media is a valuable tool for InterAct to share our work, raise awareness about recovery, engage with the community, and build support for our mission. However, because we work with vulnerable people and are trusted to safeguard their wellbeing, it is essential that our social media use—both official and personal—reflects professionalism, respect, and our values.

This policy sets out how the charity's social media accounts are managed and provides guidance for staff on their personal use of social media.

Scope

This policy applies to:

- trustees;
- the Chief Executive Officer (CEO);
- employees;
- volunteers;
- sessional workers;
- agency staff;
- contractors;
- students and placements; and
- any individual acting on behalf of InterAct.

Definitions

For the purposes of this policy, **social media** is a type of interactive online media that allows parties to communicate instantly with each other or to share data in a public forum. Current examples include X (formerly known as Twitter), Facebook, YouTube, Instagram, TikTok, Snapchat, LinkedIn, WhatsApp, Discord, etc., as well as any other message boards, chatrooms, podcasts, blogs, and review and rating sites.

Legal and Regulatory Requirements

This policy has been developed with reference to:

- Data Protection Act 2018 and UK GDPR;
- Human Rights Act 1998;
- Equality Act 2010;
- Malicious Communications Act 1988;
- Communications Act 2003;
- Defamation Act 2013;
- Copyright, Designs and Patents Act 1988;
- Safeguarding Vulnerable Groups Act 2006;
- Working Together to Safeguard Children;
- Keeping Children Safe in Education 2025 best practice principles;
- Charity Commission safeguarding and governance guidance;
- Charity Commission Charities and social media guidance;
- ICO guidance relating to social media and data protection; and
- other applicable safeguarding, confidentiality, and legal obligations.

Roles and Responsibilities

Board of Trustees

The Board of Trustees is responsible for:

- maintaining oversight of reputational, safeguarding, governance, and cybersecurity risks relating to social media and online communication;
- ensuring appropriate governance arrangements are in place for official charity social media accounts;
- ensuring safeguarding and confidentiality expectations extend to online activity;
- ensuring the charity's online presence reflects InterAct's values and objectives; and
- supporting safe, lawful, and appropriate online communication practices.

Chief Executive Officer (CEO)

The CEO has overall responsibility for oversight of official charity social media arrangements.

The CEO is responsible for:

- overseeing implementation of this policy;
- managing or overseeing official InterAct social media accounts;
- authorising individuals who may post or manage official accounts;
- ensuring appropriate safeguards and account security measures are in place;
- supporting management of serious online incidents or concerns;
- ensuring safeguarding concerns arising online are escalated appropriately;
- supporting the charity's reputation and public communications; and
- ensuring online activity aligns with InterAct's values, safeguarding responsibilities, and operational aims.

The CEO may delegate responsibility for managing or posting on official accounts to authorised staff members.

Authorised Social Media Users (Service Managers, Young Adults Lead, etc.)

Only authorised individuals may post content, respond to messages, or manage official InterAct social media accounts.

Authorised users are responsible for:

- maintaining professional and respectful communication;
- ensuring posts are accurate and appropriate;
- protecting confidential and safeguarding information;
- ensuring photographs or videos are used appropriately and with consent where required;
- ensuring posts align with InterAct's values and safeguarding responsibilities;

- reporting concerns or inappropriate content promptly; and
- maintaining account security and confidentiality.

Staff, Volunteers and Trustees

All staff, volunteers, and trustees are responsible for:

- using social media and online communication safely, respectfully, and professionally;
- maintaining professional boundaries online;
- protecting confidential and safeguarding information;
- complying with safeguarding, confidentiality, and data protection requirements;
- avoiding conduct that could damage the reputation of InterAct;
- reporting online safeguarding or reputational concerns promptly; and
- complying with this policy and related procedures.

Policy

Official Charity Accounts

InterAct operates official social media accounts to:

- promote the charity and its activities;
- raise awareness of InterAct's work;
- engage positively with the community;
- share events, achievements, opportunities, and fundraising activities; and
- communicate with supporters and stakeholders.

InterAct recognises that official social media accounts are public representations of the charity and must therefore be managed professionally and responsibly at all times.

Access

Access to official InterAct social media accounts is restricted to authorised contributors approved by the CEO or Board of Trustees.

The CEO and Board of Trustees will maintain oversight of:

- account access;
- passwords and login arrangements;
- authorised contributors; and
- account security arrangements.

Passwords and access details must never be shared inappropriately or with unauthorised individuals.

Acceptable Use

InterAct expects all official social media activity to remain respectful, appropriate, and aligned with the charity's values.

Content published on official accounts must never:

- be abusive, threatening, discriminatory, or offensive;
- contain confidential or safeguarding information;
- include personal gossip or inappropriate commentary;
- be misleading or deliberately inflammatory;
- breach copyright, confidentiality, or data protection requirements;
- promote illegal activity;
- place children, young people, staff, volunteers, or others at risk; or
- damage the reputation of InterAct.

Contributors should ensure that posts are accurate, appropriate, and proportionate before publishing.

Monitoring Comments and Online Interaction

InterAct recognises that individuals have the right to engage respectfully with the charity online, including expressing criticism or disagreement.

InterAct will not remove comments simply because they are negative or critical. However, to protect the dignity, wellbeing, safety, and privacy of staff, volunteers, service users, and the wider community,

InterAct reserves the right to remove comments or block users where behaviour is:

- abusive;
- threatening;
- discriminatory;
- harassing;
- sexually inappropriate;
- deliberately inflammatory;
- misleading;
- harmful to children or vulnerable individuals; or
- likely to create safeguarding or reputational risks.

InterAct may also report unlawful or harmful content to relevant social media platforms, regulators, or statutory agencies where appropriate.

Requests from the Press or Media

Any contact from journalists, media organisations, or individuals requesting official comments on behalf of InterAct should be referred to the CEO.

Staff and volunteers must not provide official statements to the media unless authorised to do so.

Posting Images, Videos and Digital Content

InterAct takes safeguarding, privacy, dignity, and confidentiality seriously.

Photographs, videos, livestreams, and digital content involving children, young people, families, staff, volunteers, or visitors must only be used:

- where appropriate consent has been obtained (from the data subject and their parent/guardian, as appropriate);
- where safeguarding risks have been considered;
- where use is lawful and proportionate; and
- in accordance with safeguarding and data protection requirements.

Anyone who does not wish to be photographed or recorded must have their wishes respected.

Images or videos must never:

- place individuals at risk;
- identify confidential locations or sensitive information unnecessarily;
- be exploitative, humiliating, or inappropriate; or
- be used inconsistently with the consent provided.

InterAct recognises that online images and content may be copied, shared, or remain publicly accessible for long periods of time. Therefore, careful consideration should always be given before publishing content online.

Personal Social Media Accounts

General Rules

InterAct respects the right of staff, volunteers, and trustees to use personal social media accounts outside of work. However, because individuals may still be identifiable as connected to InterAct, personal social media use must remain responsible, professional, and consistent with the charity's values and safeguarding responsibilities.

Colleagues should remember that:

- they are personally responsible for the content they publish online and the comments they leave on social media platforms;
- online content may remain publicly accessible for a considerable period of time, even if later deleted;
- screenshots and shared content may circulate beyond their intended audience; and
- personal online activity may still affect InterAct's reputation, relationships, safeguarding responsibilities, and public confidence in the charity.

Where colleagues discuss matters relating to InterAct, its work, services, projects, policies, or activities online, they should:

- use their real name where appropriate;
- communicate honestly and respectfully;
- make clear that they are speaking in a personal capacity unless authorised to speak on behalf of InterAct; and
- avoid giving the impression that they are making official statements on behalf of the charity.

Where appropriate, colleagues should use wording such as:

"These views are my own and do not necessarily represent the views of InterAct."

If colleagues identify themselves online as working or volunteering for InterAct or can be identified by their name or image, they should ensure that:

- their online conduct remains polite, appropriate and acceptable to a professional who works with children, young people, families, and vulnerable individuals;
- their profile and shared content are consistent with the charity's values (<https://www.interact.org.uk/about/mission-vision-values>);
- safeguarding, confidentiality, and professional boundaries are maintained (see below); and
- they do not publish content likely to undermine trust and confidence in the charity or bring InterAct into disrepute.

Colleagues should also remember that privacy settings do not guarantee privacy and that information shared online may still become public.

Requests from the Press or Media

Any contact from journalists, media organisations, or individuals requesting official comments on behalf of InterAct should be referred to the CEO.

Staff and volunteers must not provide official statements to the media unless authorised to do so.

Professional Boundaries

Maintaining professional boundaries online is essential, particularly because InterAct works with children, young people, and vulnerable individuals.

Staff and volunteers must not communicate secretly with service users or their families using social media, engage in inappropriate personal online relationships with children or young people or otherwise blur professional and personal boundaries in ways that may create safeguarding concerns. Any concerns relating to online conduct or professional boundaries must be reported immediately.

Online Safety and Safeguarding

InterAct recognises that online risks may include:

- grooming;
- bullying;
- exploitation;
- coercion;
- sextortion;
- cyberbullying;
- harmful online communities;
- misinformation;
- impersonation or fake accounts;
- phishing or social engineering;
- AI-generated abuse or deepfake content; and
- online harassment.

Online safeguarding concerns must always be taken seriously, recorded appropriately, and escalated promptly under safeguarding procedures where necessary.

Privacy and Confidentiality

Colleagues must never share confidential information on their personal social media accounts or through personal messaging platforms.

This includes:

- personal information relating to service users, families, staff, volunteers, or trustees;
- photographs or videos taken during InterAct activities*;
- Information relating to safeguarding concerns or incidents;
- internal confidential organisational information.

*Photographs, videos, screenshots, or recordings of colleagues, service users, volunteers, or visitors must never be posted on personal social media accounts. Such images will be posted to official charity accounts with the appropriate consent and authorisation.

InterAct has the right to monitor the use of official charity systems, devices, and social media accounts where lawful and proportionate in order to:

- protect safeguarding;
- maintain cyber security;
- protect confidential information;
- investigate concerns; and
- ensure compliance with organisational policies.

Individuals should understand that:

- online content may remain accessible permanently;
- deleted posts may still be recoverable;
- screenshots may be shared externally; and
- online communications may form part of safeguarding, disciplinary, or legal investigations.

All online activity must comply with safeguarding, confidentiality, and data protection requirements.

WhatsApp, Messaging Apps and Group Chats

InterAct recognises that WhatsApp and similar messaging platforms may support communication and engagement when used appropriately.

Where messaging groups are used:

- groups should normally be created and overseen by authorised InterAct staff;
- the purpose of the group should be clear;
- safeguarding and confidentiality expectations must be followed; and
- communication should remain respectful, professional, and appropriate.

Individuals should understand that:

- group members may have access to each other's phone numbers or usernames;
- screenshots and messages may be shared externally;

- messaging apps are not private spaces; and
- safeguarding responsibilities apply at all times.

Messaging platforms should not normally be used:

- for confidential safeguarding discussions;
- for sharing sensitive personal information unnecessarily;
- for inappropriate private communication with children or young people; or
- as a replacement for formal organisational communication, where unsuitable.

Direct messaging with children or young people through official social media accounts should be avoided wherever possible. Where communication is necessary, it should be transparent, proportionate, capable of oversight and conducted in accordance with safeguarding procedures.

Where safeguarding concerns, incidents, or important decisions are discussed via messaging platforms, they must also be formally recorded in accordance with InterAct's safeguarding and recording procedures.

Reporting Non-Compliance

Any individual who becomes aware of:

- misuse of social media;
- inappropriate online behaviour;
- safeguarding concerns arising online;
- confidentiality breaches;
- cyber security concerns; or
- conduct likely to damage the reputation of InterAct

should report the matter immediately to:

- their line manager;
- the CEO; or
- the Chair of Trustees.

depending on the nature of the concern.

Any significant social media incident must be reported immediately to the CEO. The charity will assess safeguarding, reputational, legal and cyber security risks and determine whether notification to regulators, law enforcement, social media platforms, insurers or affected individuals is required.

Serious concerns may also require referral to:

- Police;
- Children's Social Care;
- the ICO;
- the Charity Commission; or
- other agencies where appropriate.

Non-Compliance

Breaches of this policy may:

- place children, young people, staff, volunteers, or others at risk;
- compromise safeguarding arrangements;
- expose InterAct to legal, reputational, safeguarding, or cybersecurity risks; and
- result in disciplinary action or other appropriate action.

Serious breaches may result in:

- safeguarding referrals;
- referral to regulators or statutory agencies;
- removal of access to systems or official accounts; or
- termination of employment or volunteering arrangements where appropriate.

Monitoring and Reviewing

InterAct is committed to ensuring this policy remains effective, appropriate, and up to date.

The Senior Management Team are responsible for monitoring and reviewing this policy and associated arrangements at least annually, or sooner where:

- legislation or guidance changes;
- safeguarding or cyber security concerns arise;
- social media use or technology changes significantly; or
- improvements are identified through incidents, complaints, audits, or operational learning.

InterAct reserves the right to remove content that breaches this policy and may block repeat offenders where necessary to protect the safety and wellbeing of the online community

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Change history

Version 1 Initial issue

Version 1 [26/05/26] Retemplated and updated to be more current and to also include guidance relating to official social media management.

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Approved By: Vickie Perkins (CEO) and Sonal Patel (Trustee)