Annexes A and B to Item 12

SOCIAL MEDIA POLICY

A guide for the use of social media to further GOsC purposes to ensure protection of the public by raising awareness of and promoting our activities and engaging with our stakeholders.

This policy applies to all Council, Committee and other associates of the General Osteopathic Council and staff.

This policy will be reviewed on an annual basis. The General Osteopathic Council will amend this policy, following consultation, where appropriate.

Date of last review: January 2024

Ownership: Council

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Introduction

What is social media?

1. Social media is the term given to web-based tools and applications which enable users to create and share content (words, images, audio? and video content), and network with each other through the sharing of information, opinions, knowledge and common interests. Examples of social media include Facebook, X (formerly known as Twitter), and LinkedIn.

Why do we use social media?

2. Social media is essential to the success of communicating General Osteopathic Council's (GOsC) work. It is important for some staff to participate in social media to engage with our audiences, participate in relevant conversations and raise the profile of GOsC's work.

3. Our objectives when using social media include to:

   - provide information to anyone with an interest in osteopathic care and our work
   - provide bite-sized pieces of information accessible to people on the move
   - communicate with people who might not usually visit this website
   - keep stakeholders and followers up to date with new developments
   - enable our followers to contribute to our work through consultations, feedback and more.

   in order to contribute to the delivery of our purpose of public protection.

Why do we need a social media policy?

4. The difference between a personal and professional opinion can be blurred on social media, particularly if you're discussing issues relating to GOsC'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.

5. This policy is intended for all staff members, Council, committee members and associates working for the General Osteopathic Council (non-executive members), and applies to content posted on both a GOsC device and a personal device. Before engaging in work-related social media activity, staff and members of the non-executive must read this policy.

Setting out the social media policy

6. This policy sets out guidelines on how social media should be used to support the delivery of the GOsCs purpose and the promotion of GOsC's work and our values. It also sets out the use of social media by staff and non-executive members 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 channels, while protecting the organisation and its reputation and preventing any legal issues.

7. Our purpose is outlined in the Osteopaths Act 1993 in our overarching objective which is 'protection of the public'. We also have duties under equalities legislation and under the Welsh Language Standards among other things.

8. Our values are:

Collaborative
We work with our stakeholders to ensure patients and osteopaths are at the centre of our approach to regulation.

Influential
We seek to support and develop those we work with to enhance public protection.

Respectful
We seek to hear, understand and consider the views of the people with whom we engage.

Evidence-informed
We use a range of evidence to guide our work to ensure the best outcomes for patients and the public.

Point of contact for social media

9. Our communications team 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 Senior Digital Communications Officer. No other staff member can post content on GOsC's official channels without the permission of the Head of Communications and Engagement or the Chief Executive.

Which social media channels do we use?

10. At present, GOsC uses the following social media channels:

- Facebook
- LinkedIn
- X, formerly known as Twitter
- YouTube

11. These social media channels are used to communicate directly with osteopaths and members of the public about the work that GOsC undertakes, as well as to promote trust and support our values.

12. As capacity develops, we may explore other social media platforms.

Purpose of our social media channels:

Facebook

13. We will post on our Facebook page items of news and information and links to further information that we think will be of interest, and invitations to send us feedback and views. We will like and reshare appropriate contents from approved organisations.

X, formerly known as Twitter

14. We will post items of news and information, links to further information that we think will be of interest, invitations to send us feedback and views, retweets of relevant news and information. We are not able to respond individually to all the tweets we receive.

LinkedIn

15. We will post on our LinkedIn page items of news and information and links to further information that we think will be of interest, and invitations to send us feedback and views. We will react to and reshare appropriate contents from approved organisations and appropriate individuals.

16. Where appropriate, we will respond to comments on our social media posts. Any responses that we publish across our social channels are correct at the time of posting. In some cases we may pass comments on to the relevant people within the GOsC. We will remove any abusive comments and derogatory remarks to ensure that our channels remain a pleasant, safe, positive and enjoyable place for all. Where appropriate we will block and/or report abusive, derogatory remarks or spam. We will provide support to staff involved in receiving abusive and derogagory messages.

17. We also share posts in Welsh across our social media channels. How we approach receiving comments in Welsh on social posts and responding in Welsh is outlined in our [Welsh Language Standards](#).

Guidelines

Using GOsC's social media channels — appropriate conduct

18. The Head of Communications, Engagement and Insight and/or the Chief Executive are responsible for signing off, setting up and managing GOsC's social media channels. Only those authorised to do so by the Head of Communications, Engagement and Insight or the Chief Executive will have access to these accounts.

19. We update and monitor our social media channels during office hours (9am to 5pm Monday to Friday). This is the responsibility of the Senior Digital Communications Officer, supported by the Senior Insight and Engagement Officers. High profile announcements, amendments of content (other than routine mistakes), deletions of content and crisis situations or other situations which are not routine should be referred to the Head of Communications, Engagement and Insight and the Chief Executive. The Head of Communications, Engagement and Insight will be responsible for checking that this policy is followed and for providing updates on compliance and breaches to the Chief Executive and where appropriate to Audit Committee.

20. All staff posting should:

   a. Be an ambassador for our brand. Staff should ensure they reflect GOsC values in what they post and should use our tone of voice. Our brand guidelines set out our tone of voice that all staff should refer to when posting content on GOsC's social media channels. The brand guidelines are available via the communications team.

   b. Make sure that all social media content has a purpose and a benefit for GOsC and accurately reflects GOsC's values.

   c. Bring value to our audience(s) and answer their questions, and help and engage with our audience.

   d. Take care with the presentation of content. Make sure that there are no typos, misspellings or grammatical errors and should also check the quality of images.

   e. Always pause and think before posting. That said, reply to comments in a timely manner, when a response is appropriate.

   f. Always check facts. Staff 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, video or other forms of manipulation.

   g. 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.

   h. Refrain from offering personal opinions via GOsC's social media accounts, either directly by commenting or indirectly by 'liking', 'sharing' or 'retweeting'. If you are in any doubt please speak to the communications team.

   i. 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.

   j. Not set up other Facebook groups or pages, Twitter accounts or any other social media channels on behalf of GOsC. By having official social media accounts in place, the communications team can ensure consistency of the messaging and tone.

   k. Be aware that we are not a political organisation, do not hold a view on party politics and are not affiliated to any political party.

   l. Be appropriately trained

21. If staff outside of the communications team wish to contribute content for social media, whether non-paid for or paid for advertising, they should speak to the communications team about this.

22. Staff must not post content about registrants or patients without their express permission and express permission from the Head of Communications, Engagement and Insight or the Chief Executive. If staff are sharing information about registrants or patients or third party organisations, this content should be labelled clearly so our audiences know it has not come directly from GOsC and such posts should be authorised by the Head of Communications, Engagement and Insight or the Chief Executive. If using interviews, videos or photos that clearly identify a child or young person, staff must ensure they have the appropriate and relevant consent of a parent or guardian before using them on social media. Any such posts must be authorised by the Head of Communications, Engagement or Insight or Chief Executive.

23. If a complaint is made on GOsC's social media channels, staff should seek advice from the Head of Communications, Engagement or Insight or the Chief Executive.

24. Sometimes issues can arise on social media which can escalate into a crisis situation because they are sensitive or risk serious damage to the GOsC's reputation. Examples might include: a complaint about GOsC's handling of a fitness to practise case or other third party content. The nature of social media means that complaints are visible and can escalate quickly. Not acting can be detrimental to GOsC.

25. Where the GOsC is tagged in social media hoping to draw attention to an issue that is not in line with our aims and objectives we do not comment.

26. The communication team regularly monitors our social media spaces for mentions of GOsC so we can catch any issues or problems early. If there is an issue that could develop or has already developed into a crisis situation, make the communications team aware. The Head of Communications, Engagement and Insight or the Chief Executive will approve responses on these circumstances. We will usually seek to make simple, factual statements and invite the individual to discuss in further detail off line.

27. If any staff outside of the communications team become aware of any comments online that they are concerned about or they think have the potential to escalate into a crisis, whether on GOsC's social media channels or elsewhere, they should speak to the Head of Communications, Engagement and Insight or the Chief Executive immediately. Our crisis communications management plan will be put in place.

28. Any incidences of any negative, complaints or abusive or vexatious comments or other matters presenting as risks to the GOsC will be reported as incidents and presented to the Audit Committee. Where appropriate issues will be escalated to the Chair of Council, the Charity Commission, the police or other regulators as appropriate.

Use of personal social media accounts — appropriate conduct

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

30. Be aware that any information you make public could affect how people perceive GOsC. You must make it clear when you are speaking for yourself and not on behalf of GOsC.

If you are using your personal social media accounts to promote and talk about GOsC's work, you must use a disclaimer such as: "The views expressed on this site/channel? are my own and don't necessarily represent GOsC's positions, policies or opinions."

31. Staff and non executive members who have a personal blog or website which indicates in any way that they work at GOsC should discuss any potential conflicts of interest with their line manager and the communications team. Similarly, staff who want to start blogging and wish to say that they work for GOsC should discuss any potential conflicts of interest with their line manager and the communications team.

32. 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 GOsC's view.

33. Use common sense and good judgement. Be aware of your association with GOsC and ensure your profile and related content is consistent with how you wish to present yourself to the general public, colleagues, Council and committees, as well as the osteopathic profession.

34. GOsC works with several organisations, including the professional membership body the Institute of Osteopathy, and osteopathic education providers. Please don't approach high profile people from your personal social media accounts to ask them to post on behalf of GOsC, as this could hinder any potential relationships that are being managed by the communications and other teams. This includes asking for retweets about GOsC. If you have any information on potential partnerships, please speak to the Head of Communications, Engagement and Insight or the Chief Executive to share the details.

35. If a staff member or non-executive is contacted by the press about their social media posts that relate to GOsC they should talk to the Head of Communications, Engagement and Insight or the Chief Executive immediately and under no circumstances respond directly.

36. GOsC does not hold a view on party politics or have any affiliation with or links to political parties. When representing GOsC, staff are expected to hold GOsC's position of neutrality. Staff who are politically active in their spare time need to be clear in separating their personal political identity from GOsC and understand and avoid potential conflicts of interest.

37. Staff and non executives should never use GOsC's logos or trademarks unless approved to do so. Permission to use logos should be requested from the communications team.

38. Always protect yourself and GOsC. 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.

39. Think about your reputation as well as GOsC'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 be the first to correct your own mistakes. Remember to adhere to the GOsC values.

40. We encourage staff to share tweets and posts that GOsC has issued. When online in a personal capacity, you might also see opportunities to comment on or support GOsC 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. However, if the content is controversial or misrepresented, please highlight this to the communications team who will respond as appropriate.

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 GOsC 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 GOsC is not ready to disclose yet. For example, a news story that is embargoed for a particular date. Please refer to our Staff and Governance handbooks.

Discrimination and harassment
Staff must not post content that could be considered discriminatory against, or bullying or harassment of, any individual, on either an official GOsC 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 and all protected characteristics
- 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. During these periods, any campaigning activity will be reviewed by the Chief Executive.

Use of social media in the recruitment process
Recruitment should be carried out in accordance with GOsC policies, and associated procedures and guidelines. Any advertising of vacancies should be done through HR and the communications team. Vacancies are shared routinely across all our social media channels.

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. This is in line with GOsC's policies.

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, GOsC also has a safeguarding responsibility. if a staff member considers that a person/people is/are at risk of harm, they should report this to the Director of Fitness to Practice or the Chief Executive, 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 GOsC 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 GOsC 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 GOsC 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 HR policies 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 the communications team. Non-executive members should comply with our Code of Conduct and procedures as outlined in our Governance Handbook.

Public Interest Disclosure

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

Annex B - Checklist for developing a social media policy

This checklist has been created by the Charity Commission for England and Wales.

This checklist has been developed to help us think about what to include in our social media policy.

We should set a regular review date for our policy. You should also check it is working effectively after any significant incident.

How your charity will use social media	Does our policy currently (or need to) cover this?
What your objectives are in using social media	Yes
What platforms you will use	Yes
Whether you will create private community groups or host discussion forums. If you will, how you will moderate these groups or forums	No, our policy does not need to cover this as we currently do not create private groups or host discussion forums
What your policy is on moderating third party content, and what comments you will respond to and how, and what comments you will like or reshare	
Your oversight and controls around who uses social media on your charity's behalf	Does our policy currently (or need to) cover this?
How you manage access to your charity's social media accounts and social media security	Yes
Who can post day-to-day content, and about what. For example, routine announcements of the charity's work	Yes
When additional approval is needed, and who is involved. For example, high profile announcements or dealing with a social media crisis	Yes
Who is responsible for reviewing and moderating content and how often	Yes
Who can delete content, and in what circumstances	Yes
Required conduct for those managing the account	Does our policy currently (or need to) cover this?
Your rules including compliance with relevant laws and any codes of conduct	Yes
Your rules around managing interactions with children and young people and/or with vulnerable people	Yes

How you will check the policy is being followed and act if it is breached	Yes
Relationship to other policies	Does our policy currently (or need to) cover this?
How this policy interacts with your policies and processes on safeguarding, risk, whistleblowing and HR	Yes
The charity's guidelines on personal social media use by trustees, employees or volunteers	Yes
Responding to incidents	Does our policy currently (or need to) cover this?
Who can amend or delete content, and in what circumstances	Yes
When you and/or your senior staff need to be involved	Yes
When issues need to be reported to the full trustee board	Yes
If, when and how you will respond to complaints or criticism on social media	Yes
What to do if you receive abusive messages including how you will support trustees, staff and volunteers if they are the subject of online abuse	No (to be updated as part of HR policy updates)
What you will do in the event of a social media crisis, for example, having a communications plan and stopping any scheduled posts or sharing content from third parties	Yes
Checking if you need to report a serious incident to the Commission or make reports to the police or other regulators	Yes