

Integrated Management System		M01	
Social Media Policy			
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1. Aim of policy

The aim of this policy is to set out WRAP's expectations and guidelines for staff use of social media.

This policy references the following policies:

- WRAP's terms and conditions of employment
- WRAP's equal opportunities policy
- WRAP's Information Systems policy
- WRAP's Data Protection policy

2. Definition of social media

For the purposes of this policy, we define social media as a type of interactive online media that allows parties to communicate instantly with each other or to share data in a public forum. This includes social media websites such as Twitter, Facebook and LinkedIn; blogs; video and photo sharing websites and apps such as YouTube, Instagram and Flickr; and instant messaging apps such as Snapchat, WhatsApp and Facebook Messenger.

You should be aware that there are many more examples of social media than can be listed here and this is a constantly changing arena. You should follow these guidelines in relation to any social media that you use.

For the purposes of this policy, WRAP includes WRAP Cymru, WRAP Northern Ireland, and all programmes and sub-brands (e.g. Courtauld 2030, Love Food Hate Waste, Recycle Now, and Wales Recycles).

3. Use of social media at work

WRAP encourages you to make reasonable and appropriate use of social media websites as part of your work. It is an important part of how we promote our services and communicate with our audiences, key stakeholders and funders.

You must be aware at all times that, while contributing to WRAP's social media activities, or when talking about your work on your personal and professional social media profiles, you are representing WRAP.

Any communications that you make in a professional capacity through social media must not:

- Bring the organisation into disrepute, for example by:
 - criticising or arguing with customers, colleagues or rivals;
 - making defamatory comments about individuals, other organisations/groups; or
 - posting images that are inappropriate or links to inappropriate content.
- Breach confidentiality, for example by:
 - revealing trade secrets or information owned by the organisation;
 - giving away personal information about an individual (such as a colleague or customer contact) without their specific consent;
 - giving away confidential organisational information (such as a rival business);
 - discussing the organisation's internal workings (such as agreements with other organisations or funders) or its future business plans that have not been communicated to the public; or
 - sharing information from closed invite-only meetings or conferences, particularly when the [Chatham House Rule](#) applies.
- Breach copyright, for example by:
 - using someone else's images (such as partner organisations or from stock libraries) or written content without permission; or
 - failing to give acknowledgement where permission has been given to reproduce something.

Do anything that could be considered discriminatory against, or the bullying or harassment of any individual, for example by:

- making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age;
- using social media to bully another individual (such as another employee in the organisation); or
- posting images that are discriminatory or offensive (or links to such content).

If in doubt about whether something is suitable to share or comment on publicly, please check with a member of the WRAP Communications Team or the relevant Digital Marketing Manager for citizen campaigns first.

3.1 Running a social media account on behalf of WRAP

As part of your role, you may be involved in running a social media account on behalf of WRAP – for example, a WRAP or citizen campaign Twitter, LinkedIn, Facebook, or Instagram account.

You should use the same safeguards as you would with any other form of communication about WRAP in the public sphere. These safeguards include:

- Making sure the intended communication has a purpose and a benefit for us.
- Obtaining the appropriate approvals, and liaising with the owner of the social media channel (usually a member of the WRAP Communications Team and/or a Digital Marketing Manager for citizen campaigns) before embarking on a public campaign using social media.
- Making sure all content is checked as part of the normal approvals process before it is published.
- Ensuring any targeting or paid social media activity undertaken complies with WRAP's Data Protection Policy as we must ensure any activity which may use personal data complies with General Data Protection Regulation (GDPR).

Any new social media accounts to be run on behalf of WRAP need to be approved by the Digital Team, and the relevant Digital Marketing Manager for citizen campaigns if applicable. This is to ensure that any new social media channels we adopt support WRAP's wider digital and social media strategies, have a clear plan for content and maintenance, and an owner. The Digital Team also maintain a log of all social media accounts operated by WRAP for business continuity, data protection and security purposes.

If you come across a useful add-on to one of our existing social media channels, please flag with the Digital Team, and the relevant Digital Marketing Manager for citizen campaigns if applicable, so that the value of any new

features can be investigated before being adopted by WRAP and WRAP staff, and we can ensure business continuity and security. This might include new messenger applications linked to social networks, or major new features such as LinkedIn Lookup, Facebook Live or Instagram Stories.

3.2 Contributing to WRAP's social media activities

You may also contribute to WRAP's social media activities, for example by writing blogs for WRAP or the citizen campaign channels, or by posting updates from events you're attending on behalf of WRAP.

Please also view training and slides at the below links for more on accessibility in social media.

Training: link [here](#)

Slides: link [here](#)

Any content for WRAP's channels should be agreed in advance and approved by the owner of the channel (usually a member of the WRAP Communications Team and/or a Digital Marketing Manager for citizen campaigns).

You can submit corporate social media content for the WRAP and WRAP Cymru LinkedIn and Twitter accounts via [this form](#).

3.3 Talking about your work on your own social media profiles

You may talk about your work on your own social media profiles. However, please consider the following issues for your personal social media presence.

- Be clear (for yourself and with your followers) which accounts are personal and which are professional.
- If you want to use a social media account to talk about your work or WRAP's public activities, make it clear on your profile that you are doing so, and add the following line to explain: "The views expressed on this site are my own and don't reflect the views of my employer". (This should be used within your Twitter profile if you are using it for work purposes and have stated your role at WRAP in your bio or Twitter content. It can be abbreviated – e.g. "Views expressed are my own").
- If you are using LinkedIn, your employer and role will already be stated, so it is recommended that you treat this as a purely professional profile. It is not necessary to include the above statement.
- Be aware that anything you publish on a social media platform may be seen by people other than your friends or followers. Please check your privacy settings on each of your social media accounts to ensure you are clear about who sees your posts and how to manage these options. Even when an account is private (for example, if your Facebook posts are set to be seen by friends only or your Twitter account is set to private) this does not stop any of your followers from sharing your post more widely, either online

or offline.

4. Personal social media use

WRAP recognises that you may want to make use of social media in a personal capacity. While you are not acting on behalf of the organisation, you must be aware that your professional and personal social media activity will be treated as one (regardless of how much you try to separate the two). We would expect your behaviour to be professional at all times as it could reflect on WRAP as an organisation.

You can reference WRAP, as this policy recognises that it is natural for employees sometimes to want to discuss their work on social media. However, it needs to be clear that your social media profile is a personal page run by an individual and not a WRAP page run by WRAP. (For example, if you wish to keep your Facebook page for personal use only, do not list your employer on your public profile).

Any communications that you make in a personal capacity through social media must not (as above):

- bring the organisation into disrepute;
- breach confidentiality;
- breach copyright; or
- do anything that could be considered discriminatory, defamatory, or be bullying or harassment of, any individual.

5. General social media best practice

Some subjects will naturally invite negative responses or aggressive discourse in online forums. Be careful discussing things on social media where emotions run high and show respect for others' opinions.

If you notice a negative or offensive post about WRAP or one of our brands, please inform a member of the WRAP Communications Team and/or the relevant Digital Marketing Manager for citizen campaigns, as appropriate. Please do not reply from your personal social media account.

If you receive a negative response from another social media user, consider first whether it's worth responding or not. Often, the best response to a deliberately inflammatory comment is no response, but a well thought through and factual response to correct a misunderstanding or in reply to a genuine complaint can turn a negative into a positive.

If you make a mistake, correct it quickly if you can and be clear about what you've done to fix it.

Contact a member of the WRAP Communications Team and/or the relevant Digital Marketing Manager for citizen campaigns, as appropriate, if you have a concern or if you need support.

If an issue arises on social media, the WRAP Communications Team or the relevant Digital Marketing Manager for citizen campaigns will initiate WRAP's social media issue and crisis management process.

6. Personal safety and security online

Regardless of whether you are using social media for professional or personal use, or both, please make yourself aware of the options available to protect your online security. Here are some of the basic steps:

- Ensure you have read the privacy policies, terms and conditions and community guidelines for each of the social media platforms you use.
- Check the privacy settings for your accounts and posts. The latest information on this can be found on each platform's website, but here are some of the main ones:
 - [Facebook privacy basics](#)
 - [Twitter: Privacy](#)
 - [Instagram: Privacy & Safety Centre](#)
 - [LinkedIn: Managing Your Account and Privacy Settings](#)
- Regularly change your social media account passwords.
- Avoid sharing your location data by default (you can switch this off in your account settings for Facebook, Instagram and Twitter and control this on each post). If you do want to share that you have been at a location (e.g. to show you were at an event), consider posting later on when you are home, but first ensure that your location settings are off.
- Double check your photos before you upload: ensure they don't contain indications as to your address or any personal/confidential information (e.g. in any letters, paperwork or information on computer screens in the background of photos).
- Ensure you understand the options for reporting and blocking users on the social media channels you use, if they break community guidelines or act in a malicious way towards you or others.

7. Linking other applications with social media accounts

You need to be cautious when using any social media applications or utilities that integrate into social media systems, such as Facebook applications or social media scheduling or analytics tools.

In general, where social media is used with an organisational account (rather than a personal one) then no application integration should take place. If there

is a distinct need to integrate an application then this should be carried out very carefully and with the advice of the Digital or IT Teams.

8. Excessive use of social media at work

If you are using social media disproportionately to your role, the resulting impact may have a detrimental effect on your productivity and/or delivery. You should ensure that use of social media does not interfere with other duties required within your role.

9. Monitoring use of social media during work time

WRAP reserves the right to monitor employees' social media usage and considers that valid reasons for checking an employee's internet usage include suspicions that the employee has:

- been using social media for personal/non-work-related reasons when he/she should be working; or
- acted in a way that is in breach of the rules set out in this policy.

Monitoring will be conducted in accordance with an impact assessment that the organisation has carried out to ensure that monitoring is necessary and proportionate. Monitoring is in WRAP's legitimate interests and is to ensure that this policy on use of social media is being complied with. This falls under the remit of WRAP's appointed Data Protection Manager, Ben Blackburn.

Monitoring will consist of checking the social media sites that an employee has visited, the duration of such visits and the content that the employee has contributed on such sites.

The information obtained through monitoring may be shared internally, including with members of the HR Team, an employee's line manager, managers in the business area in which the employee works and IT staff if access to the data is necessary for performance of their roles. However, information would normally be shared in this way only if the organisation has reasonable grounds to believe that there has been a breach of the rules set out in this policy.

The information gathered through monitoring will be retained only long enough for any breach of this policy to come to light and for any investigation to be conducted. Data is normally securely destroyed after one year.

Information obtained through monitoring will not be disclosed to third parties (unless the organisation is under a duty to report matters to a regulatory authority or to a law enforcement agency) and will not be transferred outside the European Economic Area (EEA) without specific consent or where legal conditions for transfer under GDPR are being met.

Workers have a number of rights in relation to their data, including the right to make a subject access request and the right to have data rectified or erased in some circumstances. You can find further details of these rights and how to exercise them in WRAP's employee privacy notice and data protection policy. If workers believe that the organisation has not complied with their data protection rights, they can lodge a complaint to the Information Commissioner.

Access to particular social media may be withdrawn in any case of misuse.

10. Post termination

Should you leave WRAP's employment, all property including passwords to WRAP's social media accounts will remain the property of WRAP. All your social media profiles must be updated to reflect a change in employment, and we ask that you do this within one month of leaving the organisation.

11. Use of social media in the recruitment process

Unless it is in relation to finding candidates (for example, if an individual has put his/her details on social media websites for the purpose of attracting prospective employers), the HR department and hiring managers will not, either themselves or through a third party, conduct searches on applicants on social media. This is because conducting these searches during the selection process might lead to a presumption that an applicant's protected characteristics (for example, sexual orientation or religious beliefs) played a part in a recruitment decision. This is in line with the organisation's equal opportunities policy.

12. Disciplinary action over social media use

All employees are required to adhere to this policy. Employees should note that any breach of this policy may lead to disciplinary action under WRAP's Disciplinary Procedure. Serious breaches of this policy, for example, incidents of bullying of colleagues or social media activity causing serious damage to the organisation, may constitute gross misconduct and could lead to a summary dismissal.