THE FRANK SOO
FOUNDATION

Social Media & Comms Policy

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Applicability

This policy applies to all trustees, volunteers, employees, contractors, and third-party representatives of the charity. Its requirements should be reflected in other policies and procedures, agreements and contracts, as necessary.

Purpose

Social media use is governed by a number of laws. Equally, we have a very positive reputation, and this is extremely important in delivering our charitable work. The policy will help you understand how to use social media effectively and avoid any future problems. This can be defined by websites and applications that enable users to create and share content or to participate in social networking. (including and not limited to X, Instagram, Facebook, Bluesky, Linkedin, Whatsapp etc.)

The Law

Use of social media is covered by a number of UK laws and social media has no national boundaries, so your posts may well be read in other countries. As a very simple guide, you may be breaking the law, if you post (or potentially repost) anything that may fall into any of the following categories:

- Harassment – not leaving someone alone.
- Menacing behaviour – writing something that may scare someone.
- Threatening behaviour – making someone believe that you were going to hurt them.
- Grossly offensive comments – making deeply unpleasant comments about a sensitive issue.
- Libel - a post is potentially libellous, if it is a false statement and may damage someone's reputation.
- Defamation - users may be sued for defamation, if they post an unsubstantiated rumour about someone.
- Data protection – breaching an individual's right to privacy.
- Copyright – posting material without permission that is owned by another person or organisation.

Online Safety Act

The Online Safety Act 2023 (OSA) in the UK defines illegal content as content that, when used, possessed, viewed, published, or disseminated, amounts to a relevant offense under the Act. Harmful content is defined as content that, while not necessarily illegal, could cause significant physical or psychological harm, particularly to children. The Act requires online platforms to remove both illegal content and harmful content for children, and to implement measures to prevent children from accessing harmful content.

- We apply proportionate measures to prevent children from accessing harmful and age-inappropriate content.
- We have carried out an illegal content risk assessment.
- Put in place measures to combat risks identified, including the risk of users encountering illegal harm and, potentially, using the service to facilitate or commission illegal content.

We also have measures in place to ensure we remove illegal content, including:

- Comms Officer leads on ensuring online safety is maintained.

- Our forums have easy-to-find, understandable terms and conditions and/or group rules.
- We have a complaints process which allows users to report illegal or harmful material, and a complaints process to investigate such complaints.
- We have a process to monitor content and take it down quickly if it's inappropriate.

Our Spokespeople

Only formally appointed spokespeople may represent the Foundation.

All staff and volunteers remain personally responsible for their own online content.

Guidelines

Do not breach privacy or security. Do not post personal information, such as someone's home address, and never post about individuals without their consent, unless there is little if any doubt it would be given. Remember that individuals who may not be fully competent, perhaps due to a disability or illness, such as dementia, may not be able to give consent.

Clearly state your opinions are your own. If you are not a spokesperson, make clear that your comments, opinions or tweets are your own, so these won't be interpreted as our position. This statement could appear on your profile.

Appear human. Observing certain guidelines does not mean you have to sound like a robot. Speak in the first person; bring your personality to the forefront.

Write using our 'tone of voice'. Where possible, when communicating with the public, media or government, use our 'tone of voice'.

> We are passionate in supporting our community and like a laugh as much as anyone else, but we're professional, courteous, positive and respect the right of others to hold opinions that are different to ours.

Abusive Posts. A troll is someone who intentionally causes upset, harm, or offence by provoking people online. Be careful not to confuse a troll with someone who is critical and/or upset. There will be people who have valid concerns or have a genuine complaint that may come across as angry and irate. Look at their social media to see what they post

and how they reply. Trolls often have a profile picture that is an object, rather than a person, or no profile image at all.

Disagreeing. If you disagree with something and feel you should respond, always be courteous and do not make your response personal. Focus on the issue, not the person who wrote the post. If you simply 'poke someone in the chest', you won't get a positive response. And no issue was ever solved without a solution, so offer one.

Text and Symbols. Using emoji, 'lol' etc can help add humour to a fun post, but don't use if you are making an important point, as this would trivialise your message. And using multiple exclamations, and lots of capital letters, bold and underling is 'shouting', you would not be taken seriously.

Think first, upload/tweet after. If something gets online, it stays there for a long time. Tweets now appear in Google search results. So that off-hand tweet or opinionated blog post can all be traced back to you.

Ask for a second opinion. Not sure if and how you should tweet or comment on something? Contact the safeguarding officer for advice.

Be politically neutral. It is essential that we are not only politically neutral but seen to be. We aim to influence the government and its agencies positively in support of our community and criticising them won't help us do that. Equally, we treat all recognised political parties with respect and support any of their initiatives that support our own aims, but we do not actively support or promote any individual party. Information on campaigning can be found here and here.

Ethics. We are a charity, so appearing to support or endorse (even inadvertently) anything which may have negative connotations (eg smoking, getting drunk) would be inappropriate. Posts should always be respectful of beneficiaries and portray them in a way they would wish to be, and not cause embarrassment, offence or alarm.

Respect copyright, fair use and other laws. Using imagery? Make sure you acknowledge the source and observe copyright laws.   Images of crowds at events don't require the approval of each individual, but an image where a limited number of individuals are the subject matter of the image do.   For example, an image of a band at a large cultural event, which includes the audience, doesn't require everyone in the audience's approval, but a small group of people, where they are clearly the subject of the image would. It is particularly important that you obtain permission, if you wish to use images of children or vulnerable adults.

Don't be offensive.

Extremist views, sexism, pornography/distressing or otherwise offensive imagery, racial/ethnic or religious discrimination, homophobia or disparaging comments against any minority group, such as the disabled or mentally ill would not be acceptable, under any circumstances, ever.

Meaning

Remember that the majority of our communication is through body language and voice tone/loudness etc, and the amount of written text in social media can be limited, so meaning can easily be lost. What may appear light hearted and funny to you, may potentially come across very differently on social media.

And take into account potential social and/or cultural differences in your audience who may be more sensitive to particular issues or subjects than the wider population.

Moderation of Posts on Our Social Media

We act as a platform, both online and off, for our community to debate issues that matter to them, and we actively encourage diversity of opinion. We believe that open, honest debate can help to address divisions and just because we don't agree with something, doesn't necessarily mean that we would remove it. For example, critical comments about our work are rare but, whilst we always respond in a balanced and measured way, we do not remove these, even when we do not necessarily agree with these, subject to the guidelines below.

The community has diversity of views, some strongly held. There is nothing wrong in holding strong views, but that does not automatically make alternative views offensive. In general, as long as a post does not break the law, is a genuine contribution to a debate and is not offensive, we would not usually remove it. Specifically, we will take down any post that falls into the categories below:

● Anything we believe may fall into any of the categories in the section above titled 'The Law'.
o We would remove any post that contained views that we feel the majority of reasonable people would consider to be offensive.
  o The section 'Don't be offensive' above is not an exhaustive list but does provide guidance on what would normally be considered offensive.
  o The use of 'swear words' would normally also be considered offensive.

o   As would derogatory comments about an individual or organisation.
o   Any post that is irrelevant to our work and the online conversations being held.

We may also block those posting such material and/or report the issue to the relevant authorities.

Take Down Process

- Authority to remove posts has been delegated, as follows:
  - o   Immediate take-down of posts that are obviously unacceptable - the Safeguarding officer
  - o   Take down of posts that may be unacceptable - the Safeguarding officer or the person in control of that social media platform.
- Any request to take down a post is to be managed using our complaints policy.
- Before a post is taken down, screenshot or otherwise record the post.

Fake Social Media Accounts and AI Bots

Social media bots can be helpful, but many are malicious and, with the advent of generative AI, are becoming increasingly difficult to spot. Here are some indicators that may indicate an account is a bot.

- A recent account creation date
- The account shows coordinated resharing and amplifying of posts between a small network of accounts.
- Unrealistically fast response times to others, indicating that the account is almost always online.
- Low-quality comments with limited and repetitive vocabulary
- Usernames with long, random number sequences
- Stolen profile images from real people or "patriotic" profile images (such as flags, weapons, political symbols)
- A high volume of retweeted and shared content, with limited original posts
- Limited focus on content outside of a pre-defined set of hashtags and topics.

AI Generated Imagery

Marking AI Imagery. If we use AI generated, stock or digitally enhanced imagery, particularly where the subject may be emotive or challenging, we will ensure that the way in which we do so is not reasonably likely to mislead. For example, we may make our policy on its use publicly available and use watermarks, alt text and/or footnotes and/or explain this in content text.   We may not do so where its context and/or content is unlikely to mislead or

influence. For example, an image of intergalactic war or use of a stock image on a post about opening hours.

Accuracy. We will ensure that anything portrayed in an AI image, such as medical equipment or cultural dress, is accurate, to ensure we do not offend.

Social Media. We recognise that AI deep fakes can be difficult to identify but those using our social media will be made aware of the risk. We will not like, share or support in the comments any imagery or content that we reasonably suspect to be fake.

Version Control - Approval and Review

Version No	Approved By	Approval Date	Main Changes	Review Period
1.0	Board	27/08/25	Initial draft approved	Annually