Response to Charity Commission Consultation: Charities and Social Media
March 2023

1. **Having read the guidance how clear are you about the level of oversight trustees need to have about their charity's use of social media? (multiple choice: very clear to very unclear)**

   Please tell us how we can make this clearer (open text box)

2. **Do you think the expectations set out in the guidance of the level of oversight that trustees should have of the charity's social media use are reasonable? (Y/N/DN)**
   o **If no, please tell us what level of oversight you think is reasonable (open text box)**

Following consultation with our members, individual fundraising professionals and charities across the UK, several points have been raised regarding how much oversight trustees should have of fundraising through social media:

1. Trustee boards need to improve their level of knowledge and understanding of the opportunities and risks of social media

Our members agree with the guidance's statement in the introduction: "[trustees] do not need to be an expert on social media to think about how your charity can use it effectively...". However, they do think that trustees should take time to understand how social media works in order to make informed decisions that provide charity staff with the right level of support.

Members would like trustees to work closely with staff or external experts to better understand risks and opportunities that social media can provide across different areas of their organisation. For example, some trustees might think social media's primary function is to broadcast messages, however, our members have found that it is also a valuable tool for building relationships with donors and raising awareness of their cause.

They would also like to see the commission encourage boards and senior leadership to upskill themselves in digital fundraising and communications, so that fundraising teams and other functions have the right support and capacity to make the most of social media and deliver more for their charity. This can be done in many ways, including learning from charity staff who are using social media regularly, or by seeking advice from external experts and consultants.

2. Trustees are expected to have too much oversight of social media

Concerns have also been raised that the guidance expects trustees to have too much oversight of a charity's social media activities, particularly when it comes to managing staff's personal accounts or responding to unexpected events. This could lead to further problems in the sector, including challenges recruiting trustees, charities being too risk averse, and fundraising not being carried out properly.

One example of this comes from Section 1.1, which indicates that trustees should consider which platforms their charity should be using. Fundraising campaigns are often dependent on platforms' algorithms priorisiting their content and sharing it with the right audiences, however, platforms are not transparent about what their algorithms will and will not prioritise. They will also change the kind of

content their algorithms prioritise without notifying users. Additionally, people might change which platform they primarily use, in which case fundraisers will need to change platforms so they can continue to engage with them. As a result, fundraisers must closely monitor campaign performance and might need to change platforms to meet their objectives. If they are limited to a specific list of platforms set out by trustees, they risk not being able to adapt to the needs of their donors.

Our members believe that for charities to effectively fundraise through social media, policies need to be flexible and enable staff to adapt to changes in social media that are outside of their control. Some members have found a principles-based approach effective, where trustees and staff set the values of how the charity should conduct itself on social media delegate day-to-day decision making to the appropriate staff members. Our members would like to see the Charity Commission encourage trustees to work with staff to determine when staff can make decisions, and what should be delegated to trustees.

3. **Do you think the guidance covers all the relevant issues that charities need to think about to help them use social media? (Y/N)**
   o **If no, please tell us what other issues we should include in the guidance (open text box)**

Some members think the guidance can play a role in helping charities understand how social media can be used effectively and promote best practice and therefore would like to see it include more examples and case studies.

In addition to this, our members highlighted a number of areas that the guidance could expand upon:

1. Staff wellbeing.

Although section 1.5 does mention supporting staff and trustees if they receive abuse online, our members feel the guidance should highlight the importance of proactively looking after the wellbeing of fundraisers who might have to respond to abusive messages regularly. This is particularly important if the abuse is connected to a protected characteristic, such as racism or homophobia. They would like to see trustees and senior leadership find meaningful ways to prioritise staff wellbeing, such as rotating staff so they do not manage social accounts every day, providing employees with a safe space to talk or offering mental health services.

2. Providing fundraisers with sufficient resources

Trustees have an overall duty to ensure their charity is as effective as possible, which includes ensuring fundraising activities meet their targets. We believe that to achieve this, fundraisers need more resources so they can take advantage of opportunities on social media to build relationships with donors and generate income.

Currently, our members often have to manage many different campaigns or activities simultaneously, which all have different audiences and objectives. In order to do this effectively, so that they can both

generate income and appropriately manage risk on social media, they need sufficient resources, such as more staff or access to technologies.

Members would like to see the commission encourage trustees to invest in fundraising and digital skills within their organisations. This will unlock further opportunities to generate income so charities have more resources to deliver and strengthen their work and deliver more public good.

3. Engaging with the public on social media

A fundraising campaign might receive thousands of comments from the public in a single day, all of which might say different things. This means charities need to prioritise who and what they respond to. Whilst the guidance does acknowledge that charities should consider how they approach this, our members have found that due to the range and volume of feedback they receive, often this needs to be determined on a case-by-case basis, rather than a single policy or process. They recommend that Section 1.5 Responding to incidents, includes some mention of this.

4. Anonymity online

Many platforms do not have a robust process to verify someone's age or identity. It can therefore be challenging for fundraisers to know who they are responding to on social media. Our members would like the guidance to acknowledge this, particularly when it comes to engaging with children and young people.

5. Safeguarding supporters

Some members raised that in some instances, a supporter or service user might receive online abuse after they have commented on a charity's social media post. This could be included in Section 1.5 Responding to incidents.

6. Understanding the benefits of fundraising through social media

Some concerns have been raised that the guidance focuses too much on the risks of social media and as a result, some trustees might choose not to use it to its full potential as a fundraising channel. As trustees have a duty to make sure their organisation meets its charitable objectives and is properly run, which includes making sure that they have enough funds, our members would like to see the guidance highlight the important role social media has in connecting with donors and generating much-needed income.

7. Engaging in controversial topics

It has also been raised that Section 3 Engaging on controversial topics, deters charities from engaging in constructive discussions on social media about matters relating to ESG (Environmental, Social and Governance), such as climate change or anti-racism.

Donors are increasingly expecting charities to have a position on these topics to demonstrate they share their values and are committed to making the world a better place. Some members are concerned that if charities are unable to share their position on areas like this, it will negatively impact public trust and they will lose out on donations. We would like the Commission to acknowledge that charities are justified in expressing an organisational view on topics and issues related to their charitable purpose, their values, and the expectations of their supporters.

4. Is what the guidance says about an individual's personal use of social media – whether a trustee, employee or volunteer – helpful? (Very helpful to very unhelpful)
   o **Please tell us how we could improve this (open text box)**

Our members recognise that staff members' personal social media activity can pose a reputational risk to the charity; however, they have also found that many members of staff or volunteers will take on personal fundraising challenges and post about it online. This can be an effective way to inspire others to give.

Some members are also concerned that the guidance might deter charity staff or volunteers from championing their organization's cause. Instead, they would recommend that charities provide staff with support on how to talk about their cause when they are fundraising.

5. As a result of reading the guidance how confident would you be that you know what to include in a social media policy? (Very confident to very unconfident)
   o **Please provide us with any comments you have about this (open textbox)**

Our members are concerned that the guidance implies charities should have static social media policies. This approach could hold charities back from fundraising responsibly and effectively, which is also an important part of trustees' duties.

As platforms will change their policies and procedures, fundraisers must be able to adapt quickly to accommodate this, meaning a very prescriptive procedure might not be appropriate. Equally, fundraising activities have unique objectives and audiences, meaning that the feedback they receive will differ greatly, as a result, organisations should take a case-by-case approach to responding to specific incidents.

In order to ensure policies are flexible and can accommodate the fast-paced changes in social media, our members are in favor of charities adopting a principles-based approach, where trustees and staff set the values of how the charity should conduct itself on social media and identify when a decision should be escalated to trustees. Senior leadership and frontline staff can then make decisions on specific campaigns, activities or posts.