



Mental Health Ireland

SOCIAL MEDIA POLICY

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1.0	June 2023	Aisling Gorman, Carmen Bryce & Maria Walsh-Healy	Entire Document	New Policy

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1.0 Purpose.

The purpose of this policy is to enhance and protect Mental Health Ireland, its staff and associated parties personal and professional profiles in the social media space while ensuring that the image and reputation of Mental Health Ireland as an organisation is not compromised in any way. Through this policy we aim to provide guidance and direction to Mental Health Ireland staff, volunteers, affiliated Mental Health Associations and stake holders, when using all types of social media channels on behalf of, or in association with, Mental Health Ireland. The policy also aims to

- i. promote and respect MHI's values in accordance with the MHI strategic plan (Mental Health for all, Hope, Strength, and Action 2022-2024)
- ii. promote consistent, effective, and innovative use of social media as part of MHI's activities.
- iii. have clear responsibilities and boundaries for all users of MHI's social media accounts.
- iv. clarify the expectations and role of staff using social media in a professional or personal capacity.
- v. outline communication responses where a suspected breach of this policy has occurred or is at risk of occurring (Communications Plan PA 5)
- vi. improve accessibility and inclusion of content (Web Content Accessibility Guidelines, WCAG)

2.0 Definition.

Social media, refers to any online platform that enables communication between individuals, groups, or the public. Communication via social media takes the form of text, video, image or multi-media, and invites likes / shares or comments.

The term social media refers to a computer-based technology that facilitates the sharing of ideas, thoughts, and information through virtual networks and communities. Social media is internet-based and gives users quick electronic communication of content, such as personal information, documents, videos, and photos. (Investopedia, 2023)

3.0 All involved parties.

Parties involved and responsible for adhering to this policy include all Mental Health Ireland staff, volunteers, any committee or representing body which has a role in MHI activities,
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including Mental Health Associations and affiliate organisations. This policy also governs any person acting in an official capacity for MHI or our associated organisations and individual members where they are using social media in such a way that it impacts on the reputation and values of MHI.

4.0 Supporting Internal Policies.

Mental Health Ireland IT Policy

Mental Health Ireland Health & Safety Policy

Mental Health Ireland Data Protection Policy

Mental Health Ireland GDPR procedures

Mental Health Ireland Employee Handbook

Mental Health Ireland People & Culture Policy

Mental Health Ireland Complaints Compliments and Feedback Policy

All Policies are available on request to info@mentalhealthireland.ie,

or by staff access to the Policy Hub.

5.0 Relevant literature & reference to supporting external agencies.

S.I. No 358/2020 European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2020.

<https://www.irishstatutebook.ie/eli/2020/si/358/made/en/print>

Web Content Accessibility Guidelines (WCAG) 2.1. <https://www.w3.org/TR/WCAG21/>

Online Safety and Media Regulation Act 2022.

<https://www.oireachtas.ie/en/bills/bill/2022/6/>

HSE Social Media staff use Guidelines.

<https://www.hse.ie/eng/about/who/communications/digital/social-media/social-media-and-digital-policy/>

6.0 Legal and Policy basis.

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The basis of the policy is outlined in section heading 'Purpose'. Recent legislation 'Online Safety and Media Act 2022' forms the legal importance for Mental Health Ireland's engagement with and commitment to a robust social media policy and follow-up procedural documents.

7.0 Roles and Responsibilities.

Social media responsibility for Mental Health Ireland, lies within the Communications Workstream. The Communications Workstream and roles manage the following activities.

- Posting and engagement
- Responsive and proactive public service (Signposting)
- Strategy and planning
- Advertising
- Security and Passwords
- Monitoring and listening
- Approvals (content for other internal workstreams)
- Deciding appropriate platforms to use

8.0 Branding Guidelines.

Branding for all Mental Health Ireland Social Media platforms will follow Mental Health Ireland Communications plan guidelines for branding. Branding will be organisational and signed off by the Executive Management Team in advance of changes that arise from specific events. Any official branding change will be overseen and approved by the Board of Directors.

9.0 Communication Management.

Communication refers to all types of interaction, including but not limited to inward, outbound, complimentary, complaint, crisis, and feedback. Depending on the type of communication, Mental Health Ireland will rely on this policy and other internal policies to ensure management of the response is in line with the mission and values of the organisation.

9.1 Complaints, Compliments & Comments.

Mental Health Ireland welcomes feedback from members of the public, and as such have a Complaints, Compliments and Comments function within our head office operations.

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We ask that complaints are made via the appropriate channels outlined in our Complaints Policy. For more information, please see the Complaints Policy via the Staff & Volunteer Policy Hub or by emailing info@mentalhealthireland.ie.

Compliments and comments will be sent to our Feedback Officer who will log the feedback for the ongoing learning and development of the team.

9.2 Crisis communications.

Mental Health Ireland operates Monday – Friday within normal business hours. Any events outside of these times are for specific purposes and not considered normal operational time. As a Mental Health charity organisation, Mental Health Ireland understands that crisis communications made to social media platforms can occur. Mental Health Ireland does not have capacity to offer full time monitoring of Social Media channels, and as such cannot commit to responding to crisis messages immediately. Capacity to respond to all messages is within 48 hours. Mental Health Ireland ensures that this is clearly noted on every channel along with details of support services that offer out of hours services.

Crisis communication responses are overseen by Mental Health Irelands internal communication plan, process for response and approved signposting list.

9.3 Removing inappropriate comments.

We want to keep all our platforms safe and relevant, which means we occasionally need to hide inappropriate content. This could include but is not limited to:

- Abusive messages
- Triggering content
- Posts containing inappropriate sexual details.
- Spam / commercial posts
- Disruptive posts which disrupt the conversation
- Comments which are off topic

9.4 Reporting inappropriate comments

If there are incidences of trolling, repeated spam, or other inappropriate behaviour, we reserve the right to report directly to the platform's governing body.

In exceptional circumstances, we maintain the right to disclose confidential information under the stated circumstances in 'Limits to Confidentiality'.

9.5 Removing users.

Repeated occurrences of inappropriate behaviour by the same user will result in Mental Health Ireland blocking the user on the platform.

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10.0 Record Keeping & GDPR

Mental Health Ireland do not retain individual records in relation to individual social media interactions.

Before we use a platform and associated software, we ensure they comply with European GDPR legislation.

If a person requests their comments or content are retracted Mental Health Ireland, follow the GDPR legislation and will remove the relevant content within 30 days of the request being made.

Key principles of Data Protection Rules are that data is:

1. Obtained and processed fairly.
2. Kept only for one or more specified, explicit and lawful purposes.
3. Used and disclosed only in ways compatible with these purposes.
4. Kept safe and secure.
5. Kept accurate complete and up to date.
6. Adequate, relevant and not excessive.
7. Retained for no longer than is necessary for the purpose or purposes for which it was collected.
8. Provided to data subjects on request. Provide/give a copy of his or her personal data to any individual on request.

For personal data to be processed lawfully, certain conditions will be met. These include, among other things.

- Requirements that the data subject has consented to the processing.
- That the processing is necessary for the legitimate interest of the data controller or the party to whom the data is disclosed.
- Where there is sensitive personal data being processed, the data subject's explicit consent to the processing of such data will be acquired.

For more information, please see the Mental Health Ireland Data Protection Policy, via the Staff & Volunteer Policy Hub or by emailing info@mentalhealthireland.ie.

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11.0 Protecting our users:

Mental Health Ireland is committed to protecting our online visitors' privacy and security. When a user registers with one of our social media profiles, we may use their information in the following ways:

- To monitor traffic and site usage so we can develop the site to serve our visitors.
- To notify our users of news, events, issues of relevance.

Occasionally we may need to follow organisations or individuals to connect or share content with them. This is not an endorsement of that individual or organisation.

Users are protected when interacting with Mental Health Ireland on social media through EU legislative data privacy and GDPR policies.

12.0 Data Privacy

Mental Health Ireland adheres to and is bound by EU data protection legislation. Please read our Privacy Policy carefully so that you are aware of the steps we take to protect your privacy, what information we collect and how we use it now or may use it in the future.

We will not disclose or sell our visitors' personal information outside Mental Health Ireland or to any companies and individuals associated with us.

Any material uploaded to Mental Health Ireland's online public social media sites is considered public information.

By using Mental Health Ireland's social media channels, all users are consenting to share information on a public platform, unless the communication is via a private message. It is essential that users are aware of ways to protect their identity, sensitive information, privacy and the privacy of others at all times. Sensitive information includes full names, addresses, emails, phone numbers, medical information and any information that may be used to locate a person.

12.1 Limits to Confidentiality

Mental Health Ireland recognises that there may be some situations where processing of data may be necessary without the explicit consent of the person having been obtained i.e.

- Compliance with a legal obligation

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- Protecting the vital interests of the person where the seeking of the consent of the person is likely to result in those interests being damaged
- Preventing injury to, or damage to the health, of another person; and for obtaining legal advice, or in connection with legal proceedings, or is necessary for purposes of establishing, exercising, or defending legal rights.

In such instances information may be disclosed to appropriate third parties without permission being sought.

13.0 Governance

Governance in terms of this Social Media Policy pertains to how we engage with all users online ensuring that the user experience upholds the values, ethos, and mission of Mental Health Ireland as an organisation. Our commitment to good governance in this domain ensures best practice standards as detailed below.

13.1 Our online best practice standards:

- We use our social media channels to communicate with our varied audiences.
- Our office works within usual business hours. We aim to respond to anybody who asks us a direct question on our social media channels within a reasonable time frame usually within 48 hours.
- Occasionally, if a certain topic is too detailed for social media, we may ask you to email us.
- We take responsibility for what we write and promise to exercise good judgement, sensitivity, and common sense at all times.
- We will respect our community members privacy at all times.
- We will promote and develop positive online discussions on mental health.
- We will protect the reputation of official Mental Health Ireland social media platforms.
- We will help moderate discussions appropriately.
- In the event of human error and mistakes being made, we will correct our mistake clearly and quickly.

These best practice standards are overseen by the communications manager, communications administrator, operations manager, senior management team and board of directors.

13.2 Breach of Policy

If a responsible member of Mental Health Ireland is in breach of this policy, Mental Health Ireland retains the right to address the breach with immediate effect in line

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with Mental Health Ireland's internal policies on staff conduct, volunteer engagement, communication strategy and protection of our users.

13.3 Triple Lock Standard

Mental Health Ireland have been awarded Triple Lock Standard by Charities Institute Ireland in recognition of their commitment in governance and compliance matters.

13.4 Risk Register

Mental Health Ireland holds an active, live risk register in relation to social media platforms and usage. This register is reviewed monthly to ensure compliance, user protection, mitigate against risk and to maintain best practice standards.

14.0 Protecting against Cyber Security Risks

Cyber security is the application of technologies, processes, and controls to protect systems, networks, programs, devices, and data from cyber-attacks. It aims to reduce the risk of cyber-attacks and protect against the unauthorised exploitation of systems, networks, and technologies. (ITGovernance.eu).

Cyber security risks in relation to social media are identified as:

- Artificial Intelligence
- Phishing
- Ransomware
- Multi-Channel social engineering

Mental Health Ireland have an active cyber insurance policy that covers hardware, data corruption, cybercrime, cyber liability, data breach and cyber event (loss of business income).

14.1 External IT Partners

Mental Health Ireland use the services of an external expert supplier (Calnet IT) for all IT needs including firewall and malware, cyber security, and anti-virus.

This extends only to access via networked laptops or desktops and does not extend to mobile phones.

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Mobile phones are provided by Vodafone, who offer protection as part of the business contract arrangement.

Access to administration rights to Mental Health Ireland social media channels is restricted to networked laptops and work mobile phones only.

Cyber-crime is a constantly evolving concern globally. As such Mental Health Ireland accept no liability for any third party who intercepts our security infrastructure but ensures that we take necessary steps to avoid any occurrences.

14.2 Security protocols

Mental Health Ireland follow each platform's user prompts and alerts to change passwords periodically. Only approved staff have access to passwords and platforms. All devices where platforms are accessed have individual access codes and/or biometric authentication.

14.3 Social Media Bots

Bots are software applications that perform automated tasks. There are both good bots (e.g., Chatbots) and bad bots (e.g. spread spam messages and malware)

Mental health Ireland communications team keep up to date with advances in social media and online bots in order to maintain the integrity of our social media activities.

15.0 Who and how to contact.

For information on Mental Health Ireland Social Media usage and / or this policy, please contact the Communications Manager by email: communications@mentalhealthireland.ie.

Communication by post / phone or via the main office email are also accepted.

Mental Health Ireland Head Office

- Address: 2nd Floor Marina House, 11-13 Clarence Street, Dun Laoghaire, Co. Dublin. A96 E289
- Website: www.mentalhealthireland.ie
- Mental Health Ireland Head Office, Phone No: **(01) 284 1166**
- info@mentalhealthireland.ie

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16.0 Sign Off

Policy signed by Author (Staff Member):

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Carmen Bryce

Date:

14/07/2023

Approval by Chairperson of the Board:

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