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NEW ROMNEY COUNSELLING SERVICES

Social Media Policy

Policy Owner: Board of Trustees

Approved By: Board of Trustees

Date Approved: 21st October 2026

Review Date: 1st October 2027

Version: 1.0

1. Purpose

New Romney Counselling Services (NRCS) recognises that social media can be a valuable way of raising awareness of its services, sharing information, engaging with the community and promoting mental health and emotional wellbeing.

However, social media also presents risks relating to confidentiality, safeguarding, professional boundaries, data protection and the reputation of the organisation.

The purpose of this policy is to establish clear expectations for the responsible use of social media by individuals representing or associated with NRCS.

2. Scope

This policy applies to:

- Trustees and directors
- Employees and administrative staff
- Qualified counsellors
- Student and trainee counsellors
- Volunteers, including charity shop volunteers
- Contractors and others authorised to represent NRCS

It covers the use of social media on behalf of NRCS and personal social media activity where that activity could reasonably affect clients, professional relationships, confidentiality or the organisation.

This includes platforms such as Facebook, Instagram, LinkedIn, TikTok, X, YouTube, WhatsApp groups, online forums and other digital communication platforms.

3. General Principles

All individuals associated with NRCS are expected to use social media responsibly, respectfully and professionally.

Social media activity must:

- Protect client confidentiality and privacy.
- Maintain appropriate professional and therapeutic boundaries.
- Respect the dignity and rights of others.
- Avoid discriminatory, abusive, threatening or harassing behaviour.
- Comply with relevant legislation and professional ethical standards.
- Protect the reputation and integrity of NRCS.
- Distinguish clearly between personal opinions and official organisational statements.

Individuals must not present personal views as representing NRCS unless specifically authorised to do so.

4. Confidentiality and Client Privacy

Client confidentiality is fundamental to the work of NRCS.

No individual may disclose information through social media that identifies, or could reasonably lead to the identification of, a current or former client.

This includes:

- Names, photographs or contact details.
- Details of counselling sessions or appointments.
- Personal circumstances, experiences or disclosures.
- Information about attendance at NRCS.
- Comments or descriptions that could indirectly identify a client.
- Screenshots of client communications, records or confidential documents.

This restriction applies even where names are omitted or identifying details have been changed.

Client information must never be shared for personal interest, entertainment or informal discussion.

Any proposed use of client experiences, testimonials or case studies must be authorised in advance, supported by an appropriate lawful basis and consent where required, and assessed for confidentiality and ethical risks.

NRCS will not publish identifiable client information without appropriate authorisation and a valid legal basis.

5. Professional Boundaries Between Counsellors and Clients

Counsellors and student counsellors must maintain clear professional boundaries in all online interactions.

They must not:

- Send or accept personal friend or follow requests from current clients.
- Engage in personal social media conversations with current clients.
- Use personal social media accounts to arrange or conduct counselling sessions.
- Discuss counselling relationships or client circumstances online.
- Search for information about clients on social media out of personal curiosity.

If a client attempts to make contact through a personal social media account, the counsellor should not engage in a personal exchange.

Where appropriate, the client should be directed to NRCS's approved communication channels.

Any boundary concerns should be discussed with the appropriate clinical supervisor or designated NRCS representative.

Professional ethical guidance and individual circumstances should be considered when managing contact involving former clients.

6. Official NRCS Social Media Accounts

Official NRCS social media accounts may only be created, accessed, managed or used by individuals authorised by the organisation.

The Board of Trustees, or a person formally delegated by the Board, will determine who has responsibility for managing official accounts.

Authorised users must ensure that:

- Published content is accurate, appropriate and consistent with NRCS's values.
- Posts are relevant to the charity's purposes and activities.
- Information is respectful, inclusive and non-discriminatory.
- Images, graphics and written materials are used with appropriate permission.
- Personal information is not published without a valid legal basis.
- Comments and messages are monitored appropriately.
- Complaints, safeguarding concerns and sensitive enquiries are referred through the correct channels.

Official accounts must not be used to express personal political views, promote personal commercial interests or engage in inappropriate public disputes.

7. Photographs, Videos and Consent

Photographs and videos taken at NRCS premises, events or activities must be handled carefully.

Before publishing identifiable images of individuals, NRCS must establish an appropriate lawful basis and obtain consent where required by its procedures.

Particular care must be taken where photographs could reveal that an individual is receiving counselling or accessing mental health support.

Photographs must not be taken during counselling sessions or in circumstances that could compromise client confidentiality.

Images of children or vulnerable individuals must be subject to appropriate safeguarding considerations and authorisation.

Individuals should be informed how their images will be used and how to raise concerns or withdraw consent where applicable.

8. Personal Social Media Use

NRCS respects the right of individuals to maintain personal social media accounts and express personal opinions.

However, individuals must not use personal accounts in ways that breach confidentiality, safeguarding responsibilities, professional boundaries or applicable conduct requirements.

Where an individual identifies themselves as associated with NRCS, they should make clear that personal opinions are their own.

Individuals should avoid:

- Sharing confidential organisational information.
- Posting derogatory or abusive comments about clients, colleagues, volunteers or other individuals.
- Publishing misleading information about NRCS.
- Disclosing internal disagreements, complaints or sensitive organisational matters.
- Using the NRCS name or logo without authorisation.
- Making statements that could reasonably be mistaken for official NRCS communications.

Nothing in this policy is intended to prevent lawful whistleblowing, protected disclosures, raising safeguarding concerns, reporting unlawful conduct or exercising other legal rights.

9. Responding to Social Media Enquiries

Social media may be used to provide general information about NRCS services, opening arrangements and contact details.

However, social media messaging must not be used to deliver counselling, assess individual clinical needs or discuss confidential client matters.

Where someone contacts NRCS through social media seeking counselling support, they should be directed to the charity's approved enquiry or referral process.

Individuals should not be encouraged to disclose sensitive personal information in public comments.

If a message indicates an immediate risk of harm, the person managing the account should follow NRCS's safeguarding and emergency procedures, including escalation to the appropriate safeguarding lead and emergency services where necessary.

NRCS social media accounts are not an emergency or crisis response service. This should be made clear where appropriate.

10. Complaints and Negative Comments

NRCS recognises that individuals may express concerns or dissatisfaction through social media.

Authorised account users should respond professionally and avoid arguments or defensive exchanges.

Where a complaint is received:

- Acknowledge the concern appropriately without discussing confidential details.
- Direct the individual to NRCS's formal complaints procedure.
- Refer the matter to the designated person responsible for complaints.
- Preserve relevant records where necessary.
- Avoid making public statements about individual cases or investigations.

Comments containing threats, harassment, discriminatory abuse or confidential personal information may be hidden or removed in accordance with NRCS's moderation procedures.

Legitimate criticism should not be removed solely because it is negative.

11. Safeguarding

All individuals associated with NRCS have a responsibility to report safeguarding concerns arising through social media.

This may include disclosures of abuse, threats of harm, exploitation, harassment or concerns involving children or adults at risk.

Such concerns must be reported promptly in accordance with NRCS's safeguarding policy.

Individuals must not attempt to investigate safeguarding allegations independently through social media.

Where there is an immediate danger to life or safety, emergency services should be contacted.

12. Data Protection and Information Security

Social media activity must comply with applicable data protection legislation, including the UK General Data Protection Regulation and Data Protection Act 2018.

Authorised account users must:

- Use strong passwords and multi-factor authentication where available.
- Keep login details secure.
- Avoid sharing account access with unauthorised individuals.
- Use approved devices and systems where required.
- Report suspected account compromise or unauthorised disclosure promptly.

- Ensure personal data is collected, stored and retained only where necessary and lawful.
- Follow NRCS's data protection, confidentiality and records management policies.

Any suspected personal data breach must be reported promptly to the designated NRCS data protection lead so that it can be assessed and, where legally required, reported to the Information Commissioner's Office.

13. Account Ownership and Access

All official NRCS social media accounts, associated content and administrative access arrangements belong to NRCS.

The organisation will maintain a record of authorised account administrators.

Where an authorised individual leaves NRCS or no longer requires access, permissions must be removed promptly.

Accounts should not rely solely on one individual's personal login or personal contact details.

The Board of Trustees, or its delegated representative, will oversee account access and continuity arrangements.

14. Fundraising and Promotional Activity

Social media may be used to promote NRCS fundraising events, charity shop activities, community initiatives and counselling services.

All promotional content must be accurate, transparent and consistent with applicable fundraising and advertising requirements.

Individuals must not establish fundraising campaigns or request donations in the name of NRCS without appropriate authorisation.

Any use of photographs, testimonials or personal stories must comply with confidentiality, consent and data protection requirements.

15. Responsibilities

The Board of Trustees is responsible for approving this policy, overseeing its implementation and ensuring appropriate governance of official NRCS accounts.

Authorised social media administrators are responsible for publishing appropriate content, monitoring account activity, maintaining account security and escalating concerns.

Counsellors and student counsellors are responsible for maintaining professional boundaries, protecting client confidentiality and complying with applicable ethical standards.

Employees and volunteers are responsible for following this policy and reporting concerns promptly.

16. Breaches of This Policy

Any suspected breach of this policy should be reported to the appropriate NRCS manager, designated representative or Board of Trustees.

Concerns will be considered fairly and confidentially, taking account of the circumstances and seriousness of the matter.

Depending on the nature of the breach, action may include:

- Informal guidance or additional training.
- Removal of social media access.
- Referral to the appropriate employment, volunteer or placement procedure.
- Referral to a professional body where appropriate.
- Action under safeguarding or data protection procedures.
- Reporting to external authorities where legally required.

Any response will be reasonable and proportionate.

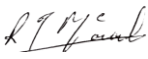
17. Related Policies

This policy should be read alongside relevant NRCS policies and procedures, including:

- Confidentiality Policy
- Data Protection and Privacy Policy
- Safeguarding Policy
- Complaints Policy
- Professional Boundaries and Code of Conduct
- Disciplinary or Volunteer Conduct Procedures
- Whistleblowing Policy

18. Policy Review

This policy will be reviewed annually, or sooner where necessary due to changes in legislation, professional guidance, technology or organisational requirements.

Approved by: 

Position: Director

Date: 21st October 2026

Next Review Date: 1st October 2027