

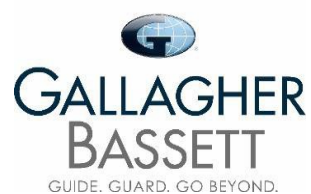


Risk control

Social Media and Social Responsibility



In partnership with



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Introduction

The Facebook data management and privacy accusation that implicated and ultimately led to the insolvency of the data analytical firm Cambridge Analytica in 2018¹ highlighted yet another aspect of the cyber risk phenomenon that has become part of everyday life for most people: the need and desire to protect personal privacy in an age in which personal information is a valued and tradeable commodity.

The magnitude of the rise of social media can be easily demonstrated if we consider the monthly active user statistics of some of the most popular platforms. As of October 2023 the leading social media platforms had amassed monthly active user numbers that can be counted in the billions²:

— Facebook	3.030 billion
— YouTube	2.491 billion
— Instagram	2.000 billion
— TikTok	1.218 billion

The Benefits

Many organisations recognise the benefits of social media and use it as a marketing tool to provide essential information to stakeholders or as a real-time customer interface to improve relationships through efficient and effective direct engagement.

The potential advantages of organisational engagement through the use of social media platforms include greater efficiencies, enhanced brand reputation, real-time interaction and feedback, and reduced costs when compared to more traditional delivery methods.

The Risks

Many technological advances introduce new risks which need to be managed, and social media as a concept is not excluded from this.

For example, back in April 2018 a commercial pilot was sacked after he and his co-pilot were caught using the Snapchat social media tool³. Innocent enough you may think, but in this instance they were both in control of a passenger plane at 30,000 feet at the time. The pilot was using his own personal Snapchat account, however, he was doing so during the course of his employment and potentially endangering the aircraft as it was considered a distraction from his responsibilities as a pilot. Had EasyJet not acted quickly to resolve this issue then the consequences to the company may have been significant.

Consequences may have included possible intervention by the Civil Aviation Authority and reputational damage to the company due to increased fears over passenger safety standards.

Public Sector organisations are not immune from the risks posed by use of social media. For example, in 2021 the Independent Office for Police Conduct (IOPC) issued a warning to officers after becoming concerned with the inappropriate use of social media⁴.

The warning followed a number of investigations into police officers posting or sharing offensive material via social media. In some of the cases cited, officers were either issued final warnings or were charged with gross misconduct, often resigning before their cases were heard.

Protecting your Brand / Reputation

As we have seen, social media platforms themselves are not the risk in the events cited above, but they do create the opportunity. Human behaviour - the way in which employees utilise and interact on these platforms can potentially create harm to an organisation. Employees should be made aware of the harm that irresponsible use of social media platforms may cause to organisations so that their behaviours may be positively influenced.

Consider the following:

1 Plan

a) The Business

Understand the organisation and its objectives. Does the company embrace social media for gain / brand / reputational enhancement? Does it rely on social media platforms to communicate and gauge the views of its stakeholders?

Failures in managing social media risk can potentially impact upon these objectives.

b) Legislation

Consider the legal implications including, but not limited to, the Human Rights Act 1998⁵, the Regulation of Investigatory Powers Act 2000⁶, the Computer Misuse Act 1990⁷, and the Data Protection Act 2018⁸.

c) Risk Management

Organisations should exercise good governance and risk management practices through the process of risk assessment. This process will create focus upon the threats created through social media / communications strategies and through unauthorised or unmanaged messaging by employees. This will help to identify where the most likely risks will occur, what the magnitude of impact may be, and how these risks can be controlled and mitigated.

d) Consider employee engagement:

Official authorised – Employees with responsibility for managing, monitoring, and responding to the organisation's social media sites.

Personal occasional – Those who use it occasionally as a personal communication tool.

Personal habitual – Those who use it habitually for personal purposes during their free time, which may include break times during the working day.

Personal refrainer – Those that do not have an account and refuse to interact with any social media

Employees at all levels of the organisational hierarchy can potentially create an adverse event which may impact upon the organisation. Consider which groups of employees would pose the highest threat.

Understand how this may come about and then develop a Social Media Policy and control system:

- Identify what the purpose of the policy is i.e. brand promotion, customer engagement, reputational protection etc. and set out measurable objectives.
- Develop a clear statement on what should and shouldn't be posted on social media, ensuring confidentiality, data protection etc.
- Ensure that there is clear information and guidelines provided to all levels of the organisational hierarchy on the use of organisational and personal social media accounts.
- Ensure the clarity of understanding across all levels of the organisational hierarchy of the potential repercussions associated with the use of social media, including inadvertent brand association and reputational damage.

2 Do

Provide awareness training, guidance and information for all levels of the organisational hierarchy.

Implement the Social Media Policy and issue associated guidance and ensure all employees understand them and the consequences of failure to adhere to them, including the potential for disciplinary action.

3 Check

Continually monitor the use of social media platforms to ensure standards are being adhered to. Where behaviours fall below expectations and defined standards, learn lessons and seek improvements through corrective actions.

4 Act

Management should conduct regular reviews of the Social Media Policy, including adherence, to ensure that it continues to be fit for purpose. Social media platforms are evolving and so is the methods of interaction by users – the policy must evolve over time to reflect changes in platforms and behaviours.

Conclusion

Social media provides easy access platforms for organisations to access potentially large numbers of people quickly and efficiently in order to improve brand awareness, real-time stakeholder interactions and relationships, customer services, and communications. The benefits can be gained across all industries and sectors.

Many large organisations use social media successfully, recognising employees as brand ambassadors and encouraging them to use social media platforms.

Balancing the potential upsides against the potential downsides is essential in these circumstances.

Common sense and sound judgement may not always be fully relied upon. People do not always behave as they may be expected to. Behaviours are often influenced by contextual issues. Organisations may wish to encourage social media use, but a balance must be struck as they also have to ensure that social responsibility is respected and adhered to through compliance with any relevant social media policy. All levels of the organisational hierarchy need to understand their responsibilities when using social media platforms and the potential consequences that they and the organisation are exposed to.

References

- 1 The Guardian, 2018, The Cambridge Analytica Files, available at: <https://www.theguardian.com/news/2018/mar/17/cambridge-analytica-facebook-influence-us-election>
- 2 Statista, 2023, Most popular social networks worldwide as of October 2023, ranked by number of active users, available at: <https://www.statista.com/statistics/272014/global-social-networks-ranked-by-number-of-users/>
- 3 The Express, 2018, EasyJet pilot FIRED after mid-flight Snapchat images were leaked, available at: <https://www.express.co.uk/travel/articles/946661/easyjet-flights-pilot-sacked-snapchat-photos>
- 4 IOPC, 2021, IOPC warns officers about inappropriate social media use, available at: <https://www.policeconduct.gov.uk/news/iopc-warns-officers-about-inappropriate-social-media-use>
- 5 The Human Rights Act 1998, available at: <https://www.legislation.gov.uk/ukpga/1998/42/contents>
- 6 The Regulation of Investigatory Powers Act 2000, available at: <https://www.legislation.gov.uk/ukpga/2000/23/contents>
- 7 The Computer Misuse Act 1990, available at: <https://www.legislation.gov.uk/ukpga/1990/18/contents>
- 8 The Data Protection Act 2018, available at: <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

Further information

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For more information, please contact your broker, RMP risk control consultant or account director.

contact@rmpartners.co.uk



Risk Management Partners

The Walbrook Building
25 Walbrook
London EC4N 8AW

020 7204 1800
rmpartners.co.uk

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