CHARITIES AGAINST HATE

A Guide to Best Practice in Ethical Digital Marketing & Comms Practices

Contents

Who we are

The Charities Against Hate collective is a group of more than 40 charities working together for real and meaningful change to ensure social media platforms address online hate which is causing real harm to real people.

Who this guide is for

While the collective is actively calling on social media companies to do more to remove hate speech from their platforms, we recognise that often this falls to organisations themselves.

This guide outlines the best practice in ethical Digital Marketing and Communications for the third sector, as agreed by the Charities Against Hate group.

It is intended for anyone working in social media, digital marketing and communications within the charity and third sector. It is not intended to be prescriptive or compulsory, but to provide a framework that can be adapted as required.

Summary of recommendations

1. Engage

Visibly engage with hate speech on charity-owned channels, where appropriate, to address issues.

2. Show inclusivity

Promote positive, diverse and inclusive content on charity-owned channels that represents your audiences.

3. Respect privacy

Respect the privacy of beneficiaries and supporters when marketing to them.

4. Provide support

Ensure adequate wellbeing support is in place for social media moderators.

5. Remember your cause

Consider which societal issues to campaign on based on charity objectives, values, relevance to the cause and ability to contribute unique insight or perspective.
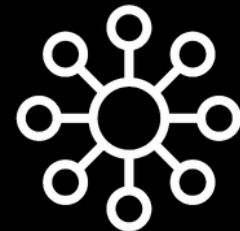
6. Sign up

Sign up to the Conscious Advertising Network and commit to their manifestos.

7. Diversify your advertising

Devise advertising diversification plans to avoid over-reliance on one platform alone.

8. Engage partners

Ensure partners and agencies adopt a similar approach to ethical marketing and communications practices, as outlined in this framework.

Free speech vs hate speech

To achieve best practice in ethical digital marketing and communications, UK charities require familiarity with basic legal definitions of hate speech and free speech.

Crown Prosecution Service guidelines (see Useful Resources) state 'if the offence is perceived by a victim or witness to have been motivated by hostility towards the victim's disability, race, religion, sexual orientation or transgender identity, it can be recorded as a hate crime.'

The Human Rights Act (see Useful Resources) allows for freedom of expression - everyone has the right to hold and express opinions on their own or in a group (even if unpopular or disturbing). But this is not an absolute right without limits.

Along with having freedom of expression, we also have a duty to act responsibly and respect other people's rights.

Freedom of expression can be restricted if someone expresses views that encourage hatred, target a particular group or individual's identity.

Creating a safe and positive online community

A charity's online channels are a space to promote their work, connect their audience, share support resources and inspire support for the cause.

Your online channels should represent your organisation's values, represent your beliefs and champion the groups you support.

By creating an online community, charities have a responsibility to protect the people within it - whether they are beneficiaries, supporters, critics or the organisation's own social media moderators. At times, this will involve taking a stand against divisive, uninformed or hateful comments.

Many brands prefer to hide or remove divisive or hateful content from their channels, often in an effort to protect their audiences and reduce brand association with the comment or content.

The Charities Against Hate collective favours visibly engaging with hate speech, wherever appropriate, to help tackle the underlying societal issues.

We believe this will in turn strengthen your online community and trust in your brand

There are exceptions to this rule, particularly in the case of hateful content that directly targets named or recognisable individuals or content that would cause distress or upset to other members of your online community. In these instances, the content should be removed from the public platform as soon as possible, but we would still recommend engaging with the poster privately to address the issues raised.

When tackling hate speech, there are a number of ways to engage. Depending on the nature of the content, we recommend an escalation process which starts with education and builds up to removing users from your online community.

Engagement should be respectful, authentic, unapologetic and in line with your brand values and tone of voice guidelines.

Hateful comments should always be reported to the social media platform they have been posted on.

1. Remove direct attacks

Remove comments that directly attack named individuals - particularly if they are beneficiaries, staff or supporters of the charity - or content that could cause significant distress or harm to members of your online community. Where possible, follow option 3 or 4 once content has been removed.

2. Tackling hateful comments

If the content contains common stereotypes, challenge them with facts. Where possible try to understand the motivations of the person posting the comment to help with your approach.

3. Zero tolerance

Unfollow

Let the individual know publicly, or if Step 1 has been taken, then privately let them know that your organisation doesn't tolerate their views and encourage them to unfollow your page.

4. Block posters of hate speech

If people are commenting regularly or are refusing to engage in a discussion, remove them from your page.

Protecting our people

Respecting the privacy of beneficiaries and service users in remarketing

This guide assumes compliance with legal obligations related to the use of digital marketing, including data protection legislation and the GDPR.

Many codes and best practice guides exist already, and it's our intent to add to their recommendations, not replace them. Charity digital marketers should be familiar with the following:

- Charity Governance Code
- The section on digital media in the Fundraising Code of Practice
- Cyber Essentials
- The Charity Commission's digital guidelines for trustees
- CAST's digital service design standards
- Voluntary Sector Digital Maturity Matrix
- Principles for Digital Development (for NGOs).

Charities use a number of recognised marketing practices to engage beneficiaries, motivate fundraisers and drive donations. We recommend the following considerations to ensure charities are marketing in an ethical way.

Remarketing

What is it?

Remarketing is the practice of allowing advertising networks to track which users have engaged with your content online or visited pages on your website, so that you can focus your ad spend on those users.

Remarketing has benefits for our audiences, because it helps make the communications they see more relevant to their interests. It also has a benefit to charities, because when advertising is more efficient, marketing budgets stretch further and more can be spent directly on the charity cause. On the other hand, it can pose a risk to the privacy of individuals.

What about consent?

Personal data is collected and held by a third party advertising network. Users of advertising-funded social media platforms (like Facebook) consent to allow those platforms to track them when they agree to the site's terms and conditions. On charity websites, cookie notices and privacy policies should make clear whether remarketing is being done and how to opt out.

Even with consent, users may not anticipate all of the ways remarketing could affect them.

Ethical charity marketers have a responsibility to consider the potential privacy consequences of digital marketing.
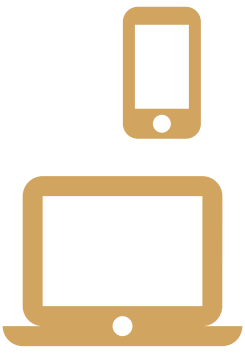
Consider shared devices

Consider whether a visit to your website could imply sensitive information about the visitor to others who may share their computer or accounts. For example, if they are researching a health condition or domestic violence services.

Do an impact assessment

An assessment can outline any potential privacy risks and measures that could be taken to mitigate them. Measures could include:

- **Restricting the pages on which a tracking pixel is deployed** (e.g. blocking pixels from pages aimed primarily at service users, or only adding pixels to pages that would indicate interest in fundraising, volunteering or donating).

- **Putting pixels on all pages so that visitors to certain pages can be specifically excluded from advertising** (e.g. preventing remarketing ads being shown to people who visited the website seeking support).

- **Prohibiting ad content that could imply prior action or intent of a user** (e.g. not using copy that encourages visitors to return, complete a registration, increase their gift, get support for their specific health condition, etc.).

- **Prohibiting remarketing if necessary.**

Are your measures robust?

Ask yourself if the risk mitigation measures you've put in place are robust enough both to:

- Reassure users - would they understand and be happy with your organisation's practices?

- Withstand scrutiny from members of the public who are critical of your organisation.

Ensuring adequate support is in place for moderators

Moderating social media channels on behalf of an organisation or brand can have a negative impact on people's mental health and wellbeing.
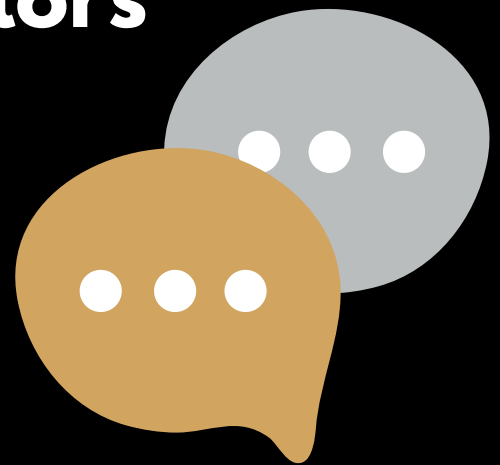
We recommend charities take steps to support staff and volunteers who may be exposed to upsetting online content, both immediately after an incident and through longer-term preventative measures.

Immediate support following an incident of online hate speech

Clear processes and information for individuals emotionally affected by harmful online content to seek support.

A break from social media/online activity for an agreed period of time.

Ability to escalate a situation if an individual feels that engaging with content would be harmful or upsetting to them.

Access to a free counselling session with a professional if desired.

Preventative measures

An internal culture that promotes positive mental health and encourages staff to prioritise their wellbeing.
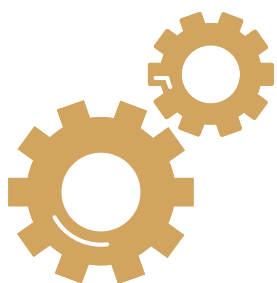
Each moderator is able to develop a wellness toolkit to help them recover after experiencing upsetting content (e.g. going for a walk, talking with a colleague, etc.).

A sufficient number of moderators are engaged to avoid overreliance on one person.
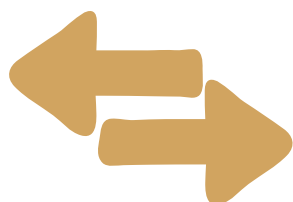
A signposting document of helplines/local support organisations is available for staff.

Online moderation time is limited to a certain number of hours a day.
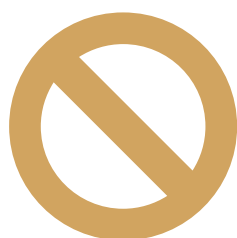
Make it clear on your social media channels that moderators are actual people, and abusive behaviour toward them will not be tolerated. Moderators will not have to continue to engage with users who are being abusive toward them.

Moderators know they can discuss concerns with a nominated person, another manager, head, member of HR team, a colleague, or an Employee Assistance Programme.

Provide a wellbeing tool like the 'HeadSpace' app to all social media staff. Tools like this may be provided through Employee Assistance Programmes.

Identify planned content that may trigger abuse and prepare FAQs.

Have the opportunity for moderators to access confidential peer support.

Senior teams could monitor sickness leave in case the stress from moderation duties is affecting moderators' wellbeing, and have open dialogues around how exposure to online hate speech and abuse may be affecting people.

Provide clear tactics and guidelines to help reduce the need for decision-making in the moment and limit contact with offending material.

Share praise and positive feedback, not just difficulties. Help moderators understand the difference they're making so that online negativity isn't all they're exposed to.

Encourage a regular digital detox day and cutoff times – no one should be worrying about online moderation in their downtime.

Consider Mental Health First Aid, resilience and conflict resolution training for staff.

Using charity voices for good

The Charity Commission's Guidance on Campaigning and Political Activity by Charities states that…

…charities may undertake campaigning and political activity as a positive way of furthering or supporting their purposes, including campaigning for changes in law, policy or decisions where such change would support their purposes.

The key issues and areas politically are:

- Charities must not exist solely for a political purpose.
- They must stress independence in the political arena and show no favour to one political party (although they may give their support to specific policies advocated by political parties).
- Charities may not allow political parties to use them or their materials as a vehicle for political gain.
- Campaigning or being politically active does not have to be mentioned in governing documents in order to allow an organisation to engage. Unless the governing documents themselves expressly restrict it.

In terms of brand, values and the decision to support a public campaign, a charity must balance whether the activity is in line with, and effective for fulfilling, their objectives. This is to the extent that it justifies spending time and resources on it.

To support colleagues in determining whether or not they should engage in campaigning, we recommend considering the following questions:

Does supporting the activity fit in the context of supporting the delivery of your charitable purposes?

Does this activism or advocacy underline and enhance your message rather than diluting or confusing it for current and potential supporters?
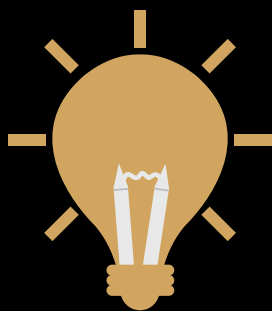
Have your members/beneficiaries been affected by this issue?

Does this issue have strong relevance with regard to your core values?

What relevance will your audience and supporters find with the issue?

How much time and resources are required in relation to what will be achieved and your own capacity?

Could your brand/organisation bring something particular to the campaign?

Does the issue affect your audience/users, even if the issue isn't directly relevant to your remit (i.e. online hate speech prevents social platforms from being a safe space for all users).

Spending charity funds on advertising

Online advertising offers an effective way for charities to raise funds and reach more people in need of support.

With this, charities have a responsibility to spend donated funds ethically and protect the interests of their audiences through the advertising they use.

Ethical advertising strategies should consider a number of things including, but not limited to:

- Diversity (in the content itself, targeting and block and inclusion lists) .
- Avoiding the funding of hate speech and fake news.
- The protection of audience privacy.

There is no 'one size fits all' approach to ethical advertising and each charity will need to define their own advertising policies in line with best practice. To support this, there are a number of organisations and coalitions that provide guidance and resources on ethical ad spend (see Useful Resources).

Recommendation

Sign up to the <u>Conscious Advertising Network</u> (CAN) coalition (see Useful Resources).

CAN has six free and publicly available manifestos which provide key principles and practical guidance for advertising good practice.

Organisations can sign up to the coalition to show their commitment to these principles. Once signed up, CAN will provide you with a starter pack and provide a reporting matrix every 6 months to track your progress.

As a first step, CAN recommend that organisations study each manifesto, prioritise the areas they will act on first and kick off internal and external conversations to work out how to embed them.

CAN note that it's important to recognise that changing advertising is a journey, so bear this in mind and don't expect to be perfect straight away.

Diversification

A recent survey of <u>200 UK charities</u> revealed that a third of organisations were too dependent on one income stream. But an overreliance on one particular digital advertising stream is another significant risk.

UK charities have become over reliant on social media for their digital advertising, particularly on Facebook (see Annex 1). Given the current crisis facing charities due to the COVID-19 pandemic, this is an alarming position to be in.

Resilience in such times is as important as efficiency, and if charities are to survive and thrive, they need to diversify their digital advertising as well as their income streams.

The issue

Beyond the toxicity seen on social media channels, the UK charity sector's overreliance on social media (especially Facebook) for digital advertising represents a significant structural weakness to our sector, for the following reasons:

Factors outside of a social media platform's control, e.g.
- being usurped by a challenger business
- facing regulatory challenges from governments.

Factors within the platform's control, e.g.
- altering its advertising model
- dramatically increasing its advertising rates

Many charities will have not planned for a major disruption to business such as this.

Recommendations

As UK charities we need to:

Recognise the risks

Recognise the risks of non-diversification of advertising channels at Senior Management Team (SMT) level.

Devise diversification plans

Ensure SMTs devise advertising diversification plans.

Professionalise our marketing

Professionalise marketing in our sector by providing marketing teams with ownership of marketing budgets. This will empower marketeers to make diverse choices on digital advertising spending.

Working with agencies and partners

Working in partnership with others is critical to the work of charities.

Whether through corporate partnerships that support income, or value-added partnerships based on mutual benefit, e.g. through skills sharing, the benefits are clear.

In a 2015 survey by the Institute of Fundraising, 80% of those charity partners who responded said they had corporate partnerships in place. The 2019 <u>C&E Corporate-NGO Partnerships Barometer</u> claimed that:

83% of charities expected their organisation to increase, or significantly increase, their investment in cross-sector partnerships over the next three years.

Charities are also often reliant on a network of third-party agencies, consultants, suppliers and individuals to help them achieve their aims.

While partnerships offer the potential for huge benefits – particularly in reaching wider audiences - they also come with inherent risk.

Careful management is needed to maximise the potential of the relationship for good, while protecting the reputation and integrity of both parties, alongside their customers, followers, supporters and beneficiaries.

Fundamental to the successful implementation of best practice digital marketing practices across the sector, is ensuring that those we work in partnership with, understand, support and amplify the best practice guidance above. Also that they use their own channels to further the ambitions of the coalition to make positive change happen.

Recommendations

Create clear policies

Establish a policy that sets out a clear basis for working with others, and ensures all partnerships are consistent with your organisational aims, e.g. which sectors can you work with, which should you avoid, what is your policy on sharing data etc.

Ensure due diligence

With any potential new partnership or relationship, conduct a due diligence check to ensure that no unjustifiable financial or reputational risk is being taken.

Communicate your values

Be clear on your values and ethics in the preliminary discussion phase to ensure your understanding is aligned.

Have a contract in place

Ensure you have a contract in place that sets out clear expectations and obligations for working together, including a process for escalation (or even termination) should behaviour on either side not meet expectations.

Offer training

Create shared understanding through training, upskilling, and shadowing.

Joint code of conduct

Consider a joint code of conduct for communications and messaging, such as this best practice guide, and encouraging partners to commit to supporting the ambitions of the collective.

Regular communications

Establish strong relationships built on trust through open and regular communication and sharing.

Address problems quickly

If things go wrong, deal with them quickly and agree a shared response, or way forward.

Check-in and evaluate

Build in regular opportunities for evaluation and learning.

Clear escalation process

Ensure you have a clear escalation process, e.g. if there is significant risk or potential for reputational damage.

Safeguard your people

If there is any risk of harm to an individual, act quickly and follow your internal safeguarding procedures.

Celebrate successes

Jointly celebrate and share learnings and success, internally and via your external comms channels.

Useful resources

Free Speech vs Hate Speech

- Crown Prosecution Service: Hate Crime
- Equality & Human Rights Commission - Article 10 Freedom of Expression

Spending Charity Funds on Advertising

- Conscious Advertising Network 6 Manifestos:
  - Anti ad fraud
  - Diversity
  - Informed consent
  - Hate speech
  - Children's wellbeing
  - Fake news
- Internet Advertising Bureau (IABUK)
  - Content verification guide
- ISBA, the Voice of British Advertisers
  - Community and brand safety
  - Platform accountability
  - Diversity and inclusion
- Charity Digital Ethical Fundraising 101

Using Charity Voices for Good

Charity Commission Campaigning and political activity guidance for charities

Sources

This document has been created by members of the Charities Against Hate group.

The following sources have informed the guidance and recommendations included:

- NCVO Charity Ethical Principles
- Charity SRI Donor and Partner Screening
- Corporate partnerships: reaping the rewards without selling out, *The Guardian*
- Institute of Fundraising: Corporate Fundraising, A snapshot of current best practice in the UK (pdf)
- Charities and Commercial Partners, research by Charity Commission
- Charities now see corporate partnerships as good for stability says report, *Third Sector*
- Techs, thugs and %*&$ing trolls, CharityComms
- Taking on the trolls: Meet the brands fighting hate speech online, *Marketing Week*
- How brands should respond to hate speech, WARC
- How hate speech campaigners found Facebook's weak spot, *The Guardian*
- What is the difference between online hate and free speech, Stop Hate UK

Annex 1

Why are UK charities over reliant on social media for digital advertising?

Many charities turn to Facebook as their number one advertising tool. Unlike other channels you can:

- Reach incredibly large audiences at the click of a button - statista.com shows there are currently 2.7 billion (and growing) users on Facebook. Facebook-use accounts for a whopping 20 percent of all time online, Business Insider says 'More time on Facebook means more time spent interacting with your business's presence there'.
- Reach audiences who spend vast amounts of time on the channel.
- Set up ads in house quickly and cheaply.
- Target your audience - down to pinpointing the exact geo-location of your audience and targeting them at optimum time for a conversion.
- Re-target users that have visited your website and build audiences based on lookalikes.
- Increase your fundraising - Facebook's birthday fundraiser has raised 3 billion alone (and charities don't have to do anything!).
- Attract new audiences that you wouldn't have reached before.
- Monitor ad performance in real time.

- Test performance of ads and make tweaks and changes to optimise performance.
- Integrate your e-commerce via one-click purchases.

www.charitiesagainsthate.com