



1 Introduction

- 1.1 The Company understands that the internet and mobile communications technology are increasingly used as a means of communication both at work and at home. This policy outlines the standards we require staff to observe when using social media, the circumstances in which the Company will monitor use of social media and the action we will take if this policy is breached.
- 1.2 This policy applies to all individuals, including employees, officers, workers, agency workers, consultants, contractors, volunteers, interns and casual workers (referred to as 'staff' in this policy).
- 1.3 This policy does not form part of any contract of employment and the Company may amend it at any time.

2 Social media

- 2.1 In this policy, 'social media' means internet-based applications which allow users to collaborate or interact socially by creating and exchanging content, such as social networks, community sites, blogs, microblogging sites, wikis, web forums, social bookmarking services and user rating services. Examples include: Whatsapp, Facebook, LinkedIn, YouTube, Instagram, Reddit, Twitter, SnapChat, TikTok, Flickr and Pinterest, the Company's intranet sites and the review areas of e-commerce sites.
- 2.2 Social media platforms allow us to build connections and to share ideas and content more broadly and quickly than ever before, and the Company supports their use. However, improper use of social media may give rise to a breach of your employment contract and/or the Company's policies, and/or the following:
 - 2.2.1 bullying, harassment and unlawful discrimination;
 - 2.2.2 defamation (i.e. damaging the good reputation of another person or organisation);
 - 2.2.3 contempt of court (i.e. interfering with the administration of justice, e.g. by revealing someone's identity that had been protected by the courts);
 - 2.2.4 misuse of confidential information belonging to the Company or to its customers and/or clients and/or suppliers; and
 - 2.2.5 damage to the reputation of the user, the Company and/or its customers and/or clients and/or its suppliers.



- 2.3 This policy does not seek to regulate how staff use social media in a purely private capacity, provided that use has no bearing on the Company or its activities. This policy is intended to ensure that staff understand the rules governing their use of social media in relation to their work for the Company, or when referencing the Company, or which may affect the Company or its activities. It is designed to help you use these platforms and services responsibly, so as to minimise the risks set out above and to ensure consistent standards of use of social media. This policy therefore applies where:
- 2.3.1 your use of social media relates to the Company or its activities;
 - 2.3.2 your use of social media relates to or is otherwise connected with your work, whether the intended use is personal or professional; and
 - 2.3.3 you represent yourself, or are otherwise identifiable, as someone employed by, or otherwise associated with, the Company.

3 General rules for use of social media

- 3.1 You must not use your work email address to sign up for personal use of social media websites.
- 3.2 You should have no expectation of privacy or confidentiality in anything you create or share on social media platforms. When you create or exchange content using social media you are making a public statement. As such, your content will not be private and can be forwarded to third parties without your consent. You should therefore consider the potential sensitivity of disclosing information (such as health information) to the world. Once sensitive or confidential information (or offensive or defamatory information) has been disclosed, it cannot be recovered and this may result in liability both for the Company and also you personally.
- 3.3 Bear in mind that, even if you are using social media in a personal capacity, other users who are aware of your association with the Company might reasonably think that you speak on behalf of the Company. You should also bear in mind at all times any adverse impact your content might have on the Company's reputation or client or customer or supplier relationships.
- 3.4 When creating or exchanging content on a social media platform, you must at all times comply with your contract of employment (or other contractual relationship) with the Company, the Company's disciplinary rules and any of the Company's policies that may be relevant. In particular you must:
 - 3.4.1 not harass or bully other members of staff;
 - 3.4.2 not discriminate against other members of staff;
 - 3.4.3 not breach the Company's policies;
 - 3.4.4 respect any confidentiality obligations owed by you or the Company, and not disclose commercially sensitive material or infringe any intellectual property or privacy rights of the Company or any third party;
 - 3.4.5 not make defamatory or disparaging statements about the Company, its shareholders, employees, customers, clients, suppliers or competitors;
 - 3.4.6 not create or exchange or link to abusive, obscene, discriminatory, derogatory, defamatory or pornographic content;
 - 3.4.7 not upload, post or forward any content belonging to a third party unless you have that third party's consent;
 - 3.4.8 ensure that any quotes from third party material are accurate;

- 3.4.9 check that a third party website permits you to link to it before including a link and ensure that the link makes clear to the user that the link will take them to the third party's site; and
- 3.4.10 not post, upload, forward or post a link to chain mail, junk mail, cartoons, jokes or gossip.
- 3.5 You should regularly review the privacy settings on your personal social media accounts and appropriately restrict the people who can read your comments. Review the content of your personal social media accounts on a regular basis and delete anything that could reflect negatively on you in a professional capacity or on the Company.
- 4. Using social media sites in the Company's name**
- 4.1 Before using social media platforms on behalf of the Company, you must obtain the approval from the Company.
- 4.2 If you are permitted to use social media sites in the Company's name, in addition to complying with the general rules above, you must also:
 - 4.2.1 clearly identify who you are, including your name and job title;
 - 4.2.2 ensure that your communications are professional in tone rather than overly-informal; and
 - 4.2.3 link back to Company communications and sites as appropriate to highlight Company products and services.
- 5 Using work-related social media**
- 5.1 The Company recognises the importance of the internet and social media in shaping public thinking about the Company, our services, staff, clients, customers and other business partners. The Company also acknowledges that our staff can have an important role to play in shaping industry/sector conversation and direction through interaction in social media.
- 5.2 Our staff are therefore permitted to interact on approved social media platforms about industry/sector developments.
- 5.3 When undertaking permitted work-related social media interaction, in addition to the general rules above, you must:
 - 5.3.1 ensure that all communications are of high quality (in terms of content and form) including being grammatically correct, accurate, objectively justifiable, reasonable and appropriate for the intended audience;
 - 5.3.2 not provide references or recommendations for anyone else on social media (whether employment or business recommendations) in any way that suggests any endorsement or recommendation by the Company;
 - 5.3.3 if you become aware of adverse criticism of the Company or of content you have created or shared, inform your line manager;
 - 5.3.4 comply with the terms and conditions and policies of the social media platforms you use;
 - 5.3.5 maintain good information security practices. Use strong passwords and make appropriate use of security and privacy settings on social media platforms;
 - 5.3.6 before you begin communication on a social media platform, evaluate your audience by gaining an insight into the type of content that is published and note any unwritten rules that are followed in discussions.

6 Rights to social media accounts

- 6.1 If, in the course of undertaking your duties under your contract of employment with the Company, you create or make use of a social media account ('Company Account'):
- 6.1.1 to the extent that the rights to the Company Account do not belong to the social media platform (eg LinkedIn, Twitter), they belong to the Company; and
 - 6.1.2 the rights to any database of customer, client or other contact details created or maintained in connection with the Company Account belong to the Company and you must not create or maintain any separate database of those contact details.
- 6.2 On termination of your employment for any reason, you must:
- 6.2.1 provide the Company with the login and password details for all Company Accounts created by you; and
 - 6.2.2 return to the Company any copies of the database relating to each Company Account and refrain from using any contact details included on that database, except to the extent that those contacts are personal to you or formed part of a database that you created before you joined the Company.

7 Breaches of this policy

- 7.1 The Company considers this policy to be extremely important. If an employee is found to be in breach of the policy, they will be disciplined in accordance with the Company's disciplinary policy and access to social media platforms may also be removed. In certain circumstances, breach of this policy may be considered gross misconduct, which may lead to immediate termination of employment without notice or payment in lieu of notice. If you are not an employee, breach of this policy may result in termination of the Company's contract with you.
- 7.2 You are also reminded that, in certain circumstances, breach of this policy may also constitute a criminal offence.
- 7.3 You should note in particular that creating or sharing content on a social media platform may amount to misconduct even if it takes place:
- 7.3.1 on a personal account with appropriate privacy settings;
 - 7.3.2 outside normal working hours; and/or
 - 7.3.3 without using the Company's computers, systems and networks.
- 7.4 If, in the course of using social media, you become aware of any misconduct or wrongdoing by any employee, officer, worker or agent of the Company, you must report it to your line manager.
- 7.5 You may be required to remove content created or shared by you which the Company deems to be in breach of this policy.


Matt Woolman

Commercial Manager