



## Dunbritton Housing Association Limited

<b>Name of Policy</b>	Social Media Policy
<b>Responsible Officer</b>	Finance & Corporate Services Manager & Data Protection Officer
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<b>Section</b>	Finance & Corporate Services
<b>Reference</b>	SM1

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## **Social Media Policy**

### **1 Introduction**

- 1.1 Dunbriton understands that the internet and social media platforms 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 we will monitor your use of social media and the action we will take if this policy is breached. This policy should be read in conjunction with our communications policy, which sets out how the Company's internet and email systems and networks can be used by our staff and representatives.
- 1.2 This policy applies to all individuals, including employees, workers, temporary and agency workers, contractors, interns, volunteers and apprentices (referred to as 'staff' in this policy).
- 1.3 Staff should refer to the Company's Data Management Policy and, where appropriate, to its other relevant policies including in relation to data protection, equality, harassment and bullying, and information security.
- 1.4 The Finance & Corporate Services Manager is responsible for monitoring and implementing this policy. If you have any questions or comments on this policy, please contact them

### **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 or platforms, community sites, blogs, microblogging sites, wikis, web forums, social bookmarking services and user rating services.
- 2.2 Social media platforms allow us to build connections and to share ideas and content more broadly and quickly than ever before, and we support their use. However, improper use of social media may give rise to a breach of your employment contract and/or our policies, and/or defamation (i.e. damaging the good reputation of another person or organisation), breach of data protection laws, misuse of our confidential information or that of our customers, clients and/or suppliers and/or reputational damage.
- 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 Association 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 us, or when referencing the Association, or where use of social media may affect us or our 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 Association 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;
- 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 platforms.
- 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 retweeted, copied or forwarded to third parties without your consent. You should therefore consider the potential sensitivity of disclosing information (such as health information) on a platform. 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 for 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 us might reasonably think that you speak on our behalf. You should take account of any adverse impact your content might have on our reputation or our relationships with customers, suppliers and other business partners.
- 3.4 We ask that no member of staff details their employment with Dunbritton as part of their account or profile.
- 3.5 When creating or exchanging content on a social media platform, you must at all times comply with your contract of employment and other contractual relationship with us, our disciplinary rules and any of our policies that may be relevant. In particular you must:
  - 3.5.1 not harass or bully other members of staff or breach our harassment and bullying policy;
  - 3.5.2 not discriminate against other members of staff or third parties or breach our equality policy;
  - 3.5.3 not breach GDPR;
  - 3.5.4 respect any confidentiality obligations owed by you or us, and not disclose commercially sensitive material or infringe any intellectual property or privacy rights of the Company or any third party;
  - 3.5.5 not make defamatory or disparaging statements about the Company, its shareholders, employees, customers, suppliers or competitors;
  - 3.5.6 not create or exchange or link to abusive, obscene, discriminatory, derogatory, defamatory or pornographic content;

- 3.5.7 not upload, post or forward any content belonging to a third party unless you have that third party's consent;
- 3.5.8 Not post or share any view or opinions that may be deemed to be wholly at odds with the purpose and values of Dunbritton Housing Association.

#### **4 Using social media platforms in the Company's name**

- 4.1 In order to protect our commercial interests, only the Finance & Corporate Services Team are permitted to post material on any social media platform in Dunbritton's name and/or on the Association's behalf. Any breach of this restriction could be treated as gross misconduct.

#### **5 Using work-related social media**

- 5.1 We recognise the importance of the internet and social media in shaping public thinking about the Association our services, staff, customers and other business partners. We also acknowledge 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 social media platforms about industry/sector developments and any other relevant issues, eg regulatory matters.
- 5.3 When undertaking permitted work-related social media interaction, in addition to the general rules above, you must:
  - 5.3.1 clearly identify yourself.
  - 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. If you wish to provide a reference or recommendation, you should seek advice from the Finance & Corporate Services Manager and ensure that any such reference or recommendation can be withdrawn at any time as we may require;
  - 5.3.3 comply with the terms and conditions and policies of the social media platforms you use;
  - 5.3.4 maintain good information security practices. Use strong passwords and make appropriate use of security and privacy]settings on social media platforms;
  - 5.3.5 seek approval from your line manager before creating or exchanging comments on colleagues, customers, suppliers or competitors;

- 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 Personal use of social media platforms**

- 6.1 You may make reasonable use of social media platforms for personal provided use is minimal and takes place substantially out of normal working hours (i.e. during your lunch break or before or after work), it does not interfere with your duties and business and office commitments and is strictly in accordance with this policy.
- 6.2 Any unauthorised use of social media platforms is strictly prohibited. Permission to use our systems to access social media platforms for personal use may be withdrawn at any time at our discretion.

## **7 Monitoring**

- 7.1 Our communications policy and Data Management Policy, in particular in relation to our right to monitor, intercept and read communications, applies equally to use of social media platforms via the Company's systems or network.
- 7.2 We will also monitor how we use social media generally and what is said about us and about our competitors.
- 7.3 We may monitor your LinkedIn and other business-related social media profiles during your notice period and during the period of any relevant post-termination restrictions to which you are subject, for the purposes of our legitimate interests, i.e. to ensure that any non-competition provision is complied with. We will only carry out such monitoring where there are no other, less invasive, means available.

## **8 Recruitment**

- 8.1 We may carry out pre-employment vetting of a job applicant's professional use of social media platforms during the recruitment process, where necessary to protect the Company's legitimate interests. Where we do so, searches will be conducted in accordance with data protection laws and our equality policy.
- 8.2 We shall not review private social media accounts as part of the recruitment process.

## **9 Breaches of this policy**

- 9.1 If an employee is found to be in breach of the policy, they will be disciplined in accordance with our disciplinary policy. 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. As an alternative, we may withdraw your access to social media platforms via our

systems. If you are not an employee, breach of this policy may result in termination of our contract with you.

- 9.2 Former staff should be aware that any breaches to this policy may result in the withdrawal of any references and may impact any future re-employment.
- 9.3 Staff should note in particular that creating or sharing content on a social media platform may amount to misconduct even if it takes place:
  - 9.3.1 on a personal account with appropriate privacy settings;
  - 9.3.2 outside normal working hours; and/or
  - 9.3.3 without using our computers, systems and networks.
- 9.4 Staff are also reminded that, in certain circumstances, an act that breaches this policy may also constitute a criminal offence.
- 9.5 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 the Finance & Corporate Services Manager.
- 9.6 You may be required to remove content created or shared by you which we deem to be in breach of this policy.
- 9.7 Employees who feel that they have been harassed or bullied because of material posted or uploaded by a colleague onto a social media platform should inform their line manager.

## 10. **Equality & Diversity**

- 10.1 As a service provider and employer, we recognise the requirements of the Equality Act 2010, oppose any form of discrimination and will treat all customers, internal and external, with dignity and respect. We recognise diversity and will ensure that all of our actions ensure accessibility and reduce barriers to employment and the services we provide.