Social media is any online platform or app that allows parties to communicate instantly with each other or to share data in a public forum. This includes social forums such as, but not limited to, Twitter, Instagram, Facebook and LinkedIn. Social media also covers blogs and video and image-sharing websites such as YouTube.

Employees should be aware that there are many more examples of social media than can be listed here and this is a constantly changing area. Employees should follow these guidelines in relation to any social media that they use.

The Company understands that employees may wish to use their own computers or devices (such as a smart phone) to access social media while they are at work. Employees must limit their use of social media on their own equipment to their official rest breaks such as their lunch break/times.

The Company encourages employees to make reasonable and appropriate use of social media as part of their work. It is an important part of how the Company promotes its services. Employees may contribute to the Company's social media activities, for example, but not limited to, writing for our blogs, managing a Facebook account or running an official Twitter account.

Employees must be aware at all times that, while contributing to the Company's social media activities, they are representing the Company. Employees who use social media as part of their job must adhere to the following rules.

Employees should use the same safeguards as they would with any other form of communication about the Company in the public sphere. These safeguards include:

- Making sure that the communication has a purpose and a benefit for the Company.
- Obtaining permission from a manager before embarking on a public campaign using social media; and
- Getting a colleague to check the content before it is published.

Any communications that employees make in a professional capacity through social media must not:

- Bring the Company into disrepute, for example by:
  - criticising or arguing with clients, colleagues or rivals;
  - making defamatory comments about individuals or other organisations or groups; or
  - o posting images that are inappropriate or links to inappropriate content;
- Breach confidentiality, for example by:
  - o revealing trade secrets or information owned by the Company;
  - giving away confidential information about an individual (such as a colleague, candidate or client contact) or organisation (such as a rival business); or

- discussing the Company's internal workings (such as deals that it is doing with a client or its future business plans that have not been communicated to the public);
- Breach copyright, for example by:
  - o using someone else's images or written content without permission;
  - failing to give acknowledgement where permission has been given to reproduce something; or
- Do anything that could be considered discriminatory against, or bullying or harassment of, any individual, for example by:
  - making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age;
  - using social media to bully another individual (such as an employee of the Company); or
  - posting images that are discriminatory or offensive or links to such content.

The Company reserves the right to monitor employees' social media usage. The Company considers that valid reasons for checking an employee's internet usage include suspicions that the employee has:

- Been using social media for personal/non-work-related reasons when they should be working; or
- Acted in a way that is in breach of the rules set out in this policy.

Monitoring is in the Company's legitimate interests and is to ensure that this policy on use of social media is being complied with. At all times any such monitoring will be undertaken in line with the Company's **Data Protection Policy**.

Access to particular social media may be withdrawn in any case of misuse.

## Social media in your personal life

The Company recognises that many employees make use of social media in a personal capacity. While they are not acting on behalf of the Company, employees must be aware that they can damage the Company if they are recognised as being one of our employees.

Employees are allowed to say that they work for the Company, which recognises that it is natural for its staff sometimes to want to discuss their work on social media. However, the employee's online profile (for example, the name of a blog or a Twitter name) must not contain the Company's name.

If employees do discuss their work on social media (for example, giving opinions on their specialism or the sector in which the Company operates), they must include on their profile a statement along the following lines: "The views I express here are mine alone and do not necessarily reflect the views of my employer."

Any communications that employees make in a personal capacity through social media should follow the same principles of acceptable use as detailed above when making posts in a professional capacity.

## Disciplinary action over social media use

All employees are required to adhere to this policy. Employees should note that any breaches of this policy may lead to disciplinary action. Serious breaches of this policy, for example incidents of bullying of colleagues or social media activity causing serious damage to the Company, may constitute gross misconduct and lead to summary dismissal.

Simon Tickle Managing Director 01 December 2024