

**POLICY & PROCEDURE**

**SOCIAL MEDIA**

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## **1. ABOUT THIS POLICY**

- 1.1 This policy is in place to minimise the risks to our business through use of social media.
- 1.2 This policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Snapchat, Wikipedia, Whisper, Instagram, Vine, Tumblr and all other social networking sites, internet postings and blogs. It applies to use of social media for business purposes as well as personal use that may affect our business in any way.
- 1.3 This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers of Education Placement Group Limited and subsidiary companies (including Supply Desk Limited, Teach In Limited and Qualified Schools Limited).
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **2. PERSONNEL RESPONSIBLE FOR IMPLEMENTING THE POLICY**

- 2.1 Our board of directors (the board) has overall responsibility for the effective operation of this policy, but has delegated day-to-day responsibility for its operation to the HR Department.
- 2.2 Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks lies with the HR Department who will review this policy with the Marketing Department to ensure that it meets legal requirements and reflects best practice.
- 2.3 Managers have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements.
- 2.4 All staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to the HR Department. Questions regarding the content or application of this policy should be directed to the HR Department.

### **3. COMPLIANCE WITH RELATED POLICIES AND AGREEMENTS**

3.1 Social media should never be used in a way that breaches any of our other policies. If an internet post would breach any of our policies in another forum, it will also breach them in an online forum. For example, you are prohibited from using social media to:

- (a) breach our IT and Communications Systems Policy;
- (b) breach our obligations with respect to the rules of relevant regulatory bodies;
- (c) breach any obligations contained in those policies relating to confidentiality;
- (d) breach our Disciplinary Policy or procedures;
- (e) harass or bully other staff in any way or breach our Anti-harassment and Bullying Policy;
- (f) unlawfully discriminate against other staff or third parties or breach our Equal Opportunities Policy;
- (g) breach our Data Protection Policy (for example, never disclose personal information about a colleague online); or
- (h) breach any other laws or regulatory requirements.

### **4. PERSONAL USE OF SOCIAL MEDIA**

4.1 Personal use of social media is never permitted during working time or by means of our computers, networks and other IT resources and communications systems

### **5. PROHIBITED USE**

5.1 You must avoid making any social media communications that could damage our business interests or reputation, even indirectly.

5.2 You must not use social media to defame or disparage us, our staff or any third party; to harass, bully or unlawfully discriminate against staff or third parties; to make false or misleading statements; or to impersonate colleagues or third parties.

5.3 You must not express opinions on our behalf via social media, unless expressly authorised to do so by your manager. You may be required to undergo training in order to obtain such authorisation. If you are authorised to

make a comment on a professional networking site you must state clearly whether these are personal views or the views of the business.

- 5.4 You must not post comments about sensitive business-related topics, such as our performance, or do anything to jeopardise our trade secrets, confidential information and intellectual property.
- 5.5 You must not include our logos or other trademarks in any social media posting or in your profile on any social media unless expressly authorised to do so.
- 5.6 Staff should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the organisation and create legal liability for both the author of the reference and the organisation.
- 5.7 Any misuse of social media should be reported to the HR Department.

## **6. GUIDELINES FOR RESPONSIBLE USE OF SOCIAL MEDIA**

- 6.1 You should make it clear in social media postings (other than business postings which we have authorised as described in paragraph 7 below), or in your personal profile, that you are speaking on your own behalf. Write in the first person and use a personal email address.
- 6.2 Be respectful to others when making any statement on social media and be aware that you are personally responsible for all communications which will be published on the internet for anyone to see.
- 6.3 If you disclose your affiliation with us on your profile or in any social media postings (other than authorised business postings as described in paragraph 7 below), you must state that your views do not represent those of your employer.
- 6.4 If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with your manager.
- 6.5 If you see social media content that disparages or reflects poorly on us, you should contact your manager.

## **7. USE OF SOCIAL MEDIA FOR BUSINESS PURPOSES**

- 7.1 Networking sites (such as LinkedIn, Twitter and Facebook) and jobs boards are valuable business tools which we use to build our brand, business and reputation, and which we recognise that you may wish to use to build your own professional reputation.
- 7.2 The business maintains company profile pages on certain networking sites including Twitter, LinkedIn and Facebook. For the avoidance of doubt, these corporate profile pages may only be edited by authorised users. Amendment of these profile pages by unauthorised users shall be a disciplinary offence.
- 7.3 If your duties require you to speak on behalf of the organisation in a social media environment, you must still seek approval for such communication from your manager, who may require you to undergo training before you do so and impose certain requirements and restrictions with regard to your activities.
- 7.4 Likewise, if you are contacted for comments about the organisation for publication anywhere, including in any social media outlet, direct the enquiry to the Marketing Department and do not respond without written approval.
- 7.5 If you are provided with access to accounts on networking sites or job boards for work purposes during your employment, or are authorised to set up a work Facebook profile, you must use the account(s) for work-related purposes for the benefit of the business alone. The account(s) should be created using your work email address only. You must notify your line manager of the details of the account including the password. You are not permitted to continue to access such accounts following the termination of your employment.
- 7.6 If you wish to use your LinkedIn account for business-related purposes, you should obtain the authorisation of your line manager.
- 7.7 The following rules apply when you access or use a networking site or jobs board for purposes connected with the business:
- (a) You must have written permission from your line manager before setting up an account or using an existing account for any networking site or jobs board for any purpose connected with the business.
  - (b) You shall inform us of activities that you carry out in relation to networking sites or jobs boards including details of your membership of sites that you have set up for business purposes and new contacts that you have made during the course of your employment.

- (c) You should also ensure that your profile and any content you post are consistent with our branding and the professional image you present to clients and colleagues.
- (d) You must check grammar and spellings in your posts.
- (e) You must comply with the terms and conditions of use of all networking sites that you use. You should pay particular attention to any codes of behaviour or professional conduct contained within those terms and conditions.
- (f) You must include your work contact details and, if appropriate, a link to the business website.
- (g) You must only upload business contacts to our database(s) when you are satisfied that the business has a legal basis for processing the personal data of that contact. You must not download or copy business contacts to personal devices.
- (h) You must regularly backup your business contacts.
- (i) You must delete any business contacts you are instructed to delete by us (which may include a general instruction to delete records in order to comply with data protection legislation).
- (j) You must only post images (including logos and other business branding) which have been approved by the Marketing Department.

## **8. TERMINATION OF EMPLOYMENT OR ENGAGEMENT WITH THE COMPANY**

- 8.1 The contact details of business contacts made during the course of your employment are our confidential information. On termination of employment you must provide us with a copy of all such information, delete all such information from your personal social networking accounts and destroy any further copies of such information that you may have.
- 8.2 On or prior to the termination of your employment or engagement for whatever reason you may be required to undertake any or all of the following steps:
  - (a) advise your business contacts on any networking site of the date on which you will be leaving the business and who your professional contacts can contact in the business when you leave;
  - (b) delete your work profile any professional networking site;
  - (c) delete all of your business contacts and not retain a copy of your business contacts' details without our prior written permission;
  - (d) hand over control of your work social media account on all or any networking site(s) to your line manager together with all passwords. We are entitled to notify your business contacts on all or any work-

related networking site(s) of the fact that we have taken over your account.

## **9. MONITORING**

- 9.1 We reserve the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that our rules are being complied with and for legitimate business purposes and you consent to such monitoring by your use of such resources and systems.
- 9.2 For further information, please refer to our IT and Communications Systems Policy.

## **10. RECRUITMENT**

We may use internet searches to perform due diligence on candidates in the course of recruitment. Where we do this, we will act in accordance with our data protection and equal opportunities obligations.

## **11. BREACH OF THIS POLICY**

- 11.1 Breach of this policy may result in disciplinary action up to and including dismissal. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.
- 11.2 You may be required to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.