

ALBYN GROUP SOCIAL MEDIA POLICY

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New Polic	New Policy			Board	08/2021			
Minor Rev	visions			Leadership Team	04/2024			
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1 INTRODUCTION AND POLICY STATEMENT

- 1.1 A key aim of Albyn Group ("the Group") is to build the mission, values and vision of the organisation into its policy and decision making on a daily basis. The Group aims to follow its guiding principles in all policies: <u>About Us Albyn (albynhousing.org.uk)</u>
- 1.2 The Group recognises that the internet provides unique opportunities to participate in interactive discussions and to share information on particular topics using a wide variety of social media, such as Facebook, X (formerly known as Twitter), Snapchat, Instagram, blogs and wikis. However, employees' use of social media can pose risks to the Group's confidential and proprietary information, and reputation, and can jeopardise its compliance with legal obligations. To minimise these risks, to avoid loss of productivity and to ensure that the Group's IT resources and communications systems are used only for appropriate business purposes, we expect employees to adhere to this policy.

2 SCOPE

- 2.1 This policy covers all Group employees, casual and agency staff, and Board Members within the Group ("Employees"). Third parties who have access to the Group's electronic communication systems and equipment are also required to comply with this policy.
- 2.2 This policy deals with the use of all forms of social media, primarily Facebook, LinkedIn, X (formerly known as Twitter) and Instagram, but including all other social networking sites, and all other internet postings, including blogs.
- 2.3 This policy also applies to the use of social media for both business and personal purposes, whether during office hours or otherwise. The policy applies regardless of whether the social media is accessed using the Group's IT facilities and equipment or equipment belonging to individual Employees.

3 **RESPONSIBILITIES**

- 3.1 All managers have a specific responsibility for operating within the boundaries of this policy, ensuring that Employees understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements.
- 3.2 Employees 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 by Employees should be reported to the Head of HR. Where it relates to a Board member, this should be reported to the Chief Executive.

4 THE POLICY IN OPERATION

- 4.1 Social media should never be used in a way that breaches other Group policies, or regulatory / legal requirements applicable to the Group. If an internet post would breach Group policies in another forum, it would also breach them in an online forum. For example, Employees are prohibited from using social media to:
 - Breach the Albyn Employee or Board Member Code of Conduct
 - Breach Group ICT policies, HR policies; Data Protection Policy, Equality & Human Rights
 Policy
 - Breach Group obligations with respect to the rules of relevant regulatory bodies
 - Defame or disparage the Group or its affiliates, tenants, customers, clients, business partners, suppliers, vendors or other stakeholders
 - Breach any other laws or ethical standards (for example, never use social media in a false or misleading way, such as by claiming to be someone other than yourself or by making misleading statements).

5 BUSINESS USE OF SOCIAL MEDIA

- 5.1 If Employee duties require them to speak on behalf of the Group in a social media environment, the Employee must still seek approval for such communication from the Marketing & Communications Officer, who may require the Employee to undergo training before they do so and impose certain requirements and restrictions with regard to their activities.
- 5.2 All content that is posted by an Employee on behalf of the Group must be accessible, and in line with Group objectives and mission.
- 5.3 Social media provides Group customers, stakeholders and partners to comment or communicate directly with the Group. These conversations can have a serious impact on brand image if not managed.

Public Messages

- If the comment contains inappropriate language or image, or language that conflicts with our Equality and Human Rights policy then it should be deleted.
- If the message is of a negative nature but does not meet the above criteria, consider whether it is appropriate to respond to the commenter but do not delete the post.
- If the message contains an action that Albyn can take, attempt to move the conversation into the private messages.
- 5.4 When communicating with Group customers, stakeholders or partners through social media channels employees must protect the organisation's reputation at all times and uphold the professional standards that are expected within the workplace.
- 5.5 If Employees are contacted for comments about the Group for publication anywhere, including in any social media outlet, direct the inquiry to the Marketing & Communications Officer and do not respond without written approval.
- 5.6 The use of social media for business purposes is subject to the remainder of this policy.

6 RECRUITMENT

6.1 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.

7 PERSONAL USE OF SOCIAL MEDIA

- 7.1 Personal use of social media is set out in the ICT Acceptable Usage Policy. It is also set out in the AHS Employee Code of Conduct.
- 7.2 The expectation of Board Member use of social media is set out in the GBM Code of Conduct
- 7.3 Employees should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the Group and create legal liability for both the author of the reference and the Group.

Examples of scenarios that are not acceptable

- Endorsing a Group contractor's skills on LinkedIn.
- Posting about poor workmanship from a Group contractor on Facebook.

Examples of scenarios that are acceptable

- Following a Group contractor's page on Facebook.
- Liking a Group contractor's post on LinkedIn.
- Leaving a general comment on a Group contractor's post on LinkedIn.

8 RESPONSIBLE USE OF SOCIAL MEDIA

- 8.1 The following sections of the policy provide Employees with common-sense guidelines and recommendations for using social media responsibly and safely.
- 8.2 Employees should not post anything on social media that could bring the Group into disrepute. Employees must not post disparaging or defamatory statements about:
 - The Group
 - Tenants and clients
 - Suppliers and vendors
 - Other affiliates and stakeholders
- 8.3 Employees should also avoid social media communications that might be misconstrued in a way that could damage our business reputation, even indirectly.
- 8.4 Employees should make it clear in social media postings that they are speaking on their own behalf, write in the first person and use a personal e-mail address when communicating via social media.
- 8.5 Employees are personally responsible for what they communicate in social media. Employees should remember that what they publish might be available to be read by the masses (including the Group itself, future employers and social acquaintances) for a long time. This should be kept in mind before any content is posted.
- 8.6 If Employees disclose their affiliation as an Employee of the Group, they must also state that their views do not represent those of the Group. For example, Employees could state, *"the views in this posting do not represent the views of my employer"*. Employees should also ensure that their profile and any content they post are consistent with the professional image they present to tenants, clients and colleagues.
- 8.7 Avoid posting comments about sensitive business-related topics, such as Group performance. Even if Employees make it clear that their views on such topics do not represent those of the Group, their comments could still damage the reputation of the Group.
- 8.8 If an Employee is uncertain or concerned about the appropriateness of any statement or posting, they should refrain from making the communication until they have discussed it with their manager or the Marketing & Communications Officer.
- 8.9 If an Employee sees content in social media that disparages or reflects poorly on the Group or its stakeholders, they should contact the Marketing & Communications Officer and appropriate operational manager or leadership team member. Employees are responsible for protecting the business reputation of the Group.

9 RESPECTING INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

- 9.1 Employees should not do anything to jeopardise the Group's confidential information and intellectual property through the use of social media. In addition, Employees should avoid misappropriating or infringing the intellectual property of other companies and individuals without express permission, which can create liability for the Group, as well as the individual author.
- 9.2 Employees are not permitted to use the Group's logos, brand names, slogans or other trademarks, or post any of the Group's confidential or proprietary information without prior written permission.
- 9.3 To protect themselves and the Group against liability for copyright infringement, where appropriate, Employees should reference sources of particular information they post or upload and cite them accurately. If an Employee has any questions about whether a particular post or upload might violate anyone's copyright or trademark, they should ask the Marketing & Communications Officer before making the communication.
- 9.4 For professional purposes, employees are permitted to add business contacts made during the course of their employment to business networking sites, such as LinkedIn.

10 RESPECTING COLLEAGUES, TENANTS, CLIENTS, PARTNERS AND SUPPLIERS

10.1 Employees must not post anything that colleagues or customers, clients, business partners, suppliers, vendors or other stakeholders would find offensive, including discriminatory comments, insults or obscenity.

11 MONITORING

11.1 Monitoring of the Group's IT resources and communications systems are set out in the Group ICT policies. Employees should not use Group IT resources and communications systems for any matter that they wish to be kept private or confidential from the Group.

12 FAILURE TO COMPLY WITH POLICY

- 12.1 Breach of this policy may result in disciplinary action up to and including dismissal. For Board members the 'Protocol for Dealing with the Code of Conduct' will be followed.
- 12.2 Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether Group equipment or facilities are used for the purpose of committing the breach. Any Employee suspected of committing a breach of this policy will be required to co-operate with any subsequent investigation, which may involve handing over relevant passwords and login details.
- 12.3 Employees may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action

13 DATA PROTECTION

13.1 The Group processes personal data in accordance with its Data Protection Policy and Privacy Notices: <u>Privacy Notice - Albyn (albynhousing.org.uk)</u>

14 EQUALITIES

14.1 This policy will be applied in accordance with the Group Equality & Human Rights Policy.