



Holden Knight Recruitment Ltd

Social Media Policy

Human Resources v1.3

Review Date: November 2027



Social Media Policy

1. Introduction

- 1.1 This policy applies to all staff regardless of their employment status. It is to be read in conjunction with the Company's Electronic Information and Communications Systems Policy. This policy does not form part of the terms and conditions of an employee's employment with the Company and is not intended to have contractual effect. It does however set out the Company's current practices and required standards of conduct and all staff are required to comply with its contents. Breach of the provisions of this policy will be treated as a disciplinary offence which may result in disciplinary action up to and including summary dismissal in accordance with the Company's Disciplinary Policy and Procedure.

2. Purpose of this Policy

- 2.1 Holden Knight recognises that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media, such as Facebook, Twitter, blogs and wikis. However, staff use of social media can pose risks to the Company's confidential and proprietary information, its reputation, and it can jeopardise our compliance with our legal obligations.
- 2.2 To minimise these risks, to avoid loss of productivity and to ensure that our IT resources and communications systems are used only for appropriate work related purposes, all Company staff are required to comply with the provisions in this policy.

3. Scope and Purpose of this Policy

- 3.1 This policy deals with the use of all forms of social media, which is a type of interactive online media which allows parties to communicate instantly with each other and share data in a public forum. This includes Facebook, LinkedIn, Twitter/ (X), Wikipedia, all other social networking sites, all other internet postings, including blogs including image sharing websites such as YouTube and Flickr.
- 3.2 This policy covers all individuals working at all levels and grades within the Company. Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy.
- 3.3 Staff should be aware that there are many more examples of social media than can be listed in this policy and this is a constantly changing area. Staff should follow these guidelines in relation to any social media that they use.
- 3.4 **This policy applies to the use of social media for both work and personal purposes, whether during work hours or otherwise. This policy applies regardless of whether the social media is accessed using our IT facilities and equipment or equipment belonging to members of staff.**
- 3.5 Breach of this policy may result in disciplinary action up to and including dismissal.
- 3.6 Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether the Company's equipment or facilities are used for the purpose of committing the breach. 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.
- 3.7 Staff 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.

4. Compliance with related policies and agreements

- 4.1 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, employees are prohibited from using social media to:
- Breach our Electronic Information and Communications Systems Policy;
 - Breach our obligations with respect to the rules of relevant regulatory bodies;
 - Breach any obligations they may have relating to confidentiality;
 - Breach our Disciplinary Rules;
 - Defame or disparage the Company, its staff, customers, young people, affiliates, partners, suppliers or other stakeholders;
 - Harass or bully other staff in any way or in breach of our Anti-harassment and Bullying Policy;
 - Unlawfully discriminate against other staff or third parties or breach our Equal Opportunities Policy;
 - Breach our Data Protection Policy (for example, never disclose personal information about a colleague or young person online);
 - Breach any other laws or ethical standards (for example, never use social media in a false or misleading way, such as claiming to be someone other than yourself or by making misleading statements).
- 4.2 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 Company and create legal liability for both the author of the reference and the organisation.
- 4.3 Staff who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

5. Personal use of social media

- 5.1 Personal use of social media is strictly not permitted during working time or by means of the Company's computers, networks and other IT resources and communications systems. This includes laptops, palm-tops and handheld computers or devices distributed by the Company for work purposes.

6. Monitoring

- 6.1 The contents of our IT resources and communications systems are the Company's property. Therefore, staff should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems.
- 6.2 The Company reserves 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 acknowledgement of this policy and your use of such resources and systems.

- 6.3 This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.
- 6.4 Holden Knight may store copies of such data or communications for a period of time after they are created and may delete such copies from time to time without notice. All staff are advised not to use the Company's IT resources and communications systems for any matter that he or she wishes to be kept private or confidential from the Company.

7. Recruitment

- 7.1 The Company may use internet searches to perform pre-employment checks on candidates in the course of recruitment. Where the Company does this, it will act in accordance with its data protection and equal opportunities obligations.

8. Responsible use of social media

- 8.1 The following sections of the policy provide staff with common-sense guidelines and recommendations for using social media responsibly and safely.

8.2 Protecting our business reputation

Staff must not post disparaging or defamatory statements about:

- The Company;
- Current, past or prospective staff;
- Current, past or prospective customers or young people;
- The Company's suppliers and services providers; and
- Other affiliates and stakeholders.

8.3 As a Holden Knight Employee you **must not:**

- Refer in any social media page or posting to Holden Knight Care as being your employer
- Refer to your employment or our young people in derogatory terms. You may have privacy settings, but the people you interact with may still know where and who you work for.
- Make any comment, or post pictures or videos which may otherwise bring the company into disrepute; including publicly criticising the organisation, a child or colleague(s)
- Not make any comment or post pictures or videos which may call into question your suitability to work with vulnerable children
- Identify or refer by implication to any of the children we educate

- 8.4 Furthermore, staff must not post disparaging, defamatory, offensive or harassing posts or posts that may breach copyright.

- 8.5 Staff should also avoid social media communications that might be misconstrued in a way that could damage the Company's reputation, even indirectly.

- 8.6 If staff are using social media, they should make it clear in any social media postings that they are speaking on their own behalf. They should write in the first person and use a personal, rather than the Company's e-mail address when communicating via social media.
- 8.7 Staff are personally responsible for what they communicate in social media. Staff should remember that what they publish might be available to be read by the masses (including the Company itself, future employers and social acquaintances) for a long time. Staff should keep this in mind before they post content.
- 8.8 If staff disclose whether directly or indirectly their affiliation to the Company as a member of staff whether past, current or prospective, they must also state that their views do not represent those of the Company. Staff must ensure that their profile and any content posted are consistent with the professional image they are required to present to their colleagues, clients and customers.
- 8.9 Staff must avoid posting comments about confidential or sensitive Company related topics. Even if staff make it clear that their views on such topics do not represent those of the Company, such comments could still damage the Company's reputation and incur potential liability.
- 8.10 If a member of staff is uncertain or concerned about the appropriateness of any statement or posting, he or she should refrain from making the communication until he or she has discussed it with his or her Manager.
- 8.11 If a member of staff sees content in social media that disparages or reflects poorly on the Company, its staff, customers, clients, young people or stakeholders, he or she is required to report this in the first instance to his or her Manager without unreasonable delay. All staff are responsible for protecting the Company's reputation.

9. Respecting colleagues, young people, clients, service providers and stakeholders

- 9.1 Staff must not post anything that the Company's past, current or prospective colleagues, young people or clients, service providers or stakeholders may find offensive, including discriminatory comments, insults or obscenity.
- 9.2 Staff must not post anything related to the Company's past, current or prospective colleagues, customers or clients, service providers or stakeholders without their advanced written permission.