

# HR21 - Social Media

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<b>Owner:</b>	Michael Catlin	<b>Job Title:</b>	Head of People & OD
<b>To be issued to:</b>		Board of Management Ark Management All Staff	
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## Version Control

Date	Owner	Version	Reason for Change
Mon	Insert Name	Insert No.	Insert Reason
Aug 2023	Michael Catlin	1	Cyclical review due & transfer to new template

## Summary of Changes

Section	Change
1	Values updated.
4	Scope and definition updated to reflect current practice.
5	Updated Legal/Regulatory Framework.
6 and 7	Social media usage updated to reflect current practice and wording updated for consistency.
8	Included caveat to capture all mediums of posts i.e. videos.
Procedure Number	Moved HR40 to HR21 for consistent numbering

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## 1.0 Arks Values

Ark's values are true to the core purpose of the organisation and the services we deliver. They determine our behaviours towards one another and what we should expect in our relationships with one another. Working within the following values will guide and help us deliver our vision and mission of Ark being an organisation where everyone is equal.

### Trust

We have confidence in our people to deliver excellent services and trust in them to do so. We will develop trusting and honest relationships and our customers will feel assured that they can rely on us to deliver

### Respect

We treat everyone fairly and we listen. We are respectful of each person with whom we come into contact and expect our people to respond professionally and treat others as they would wish to be treated.

### Understanding

We will operate with empathy and compassion and approach each situation with an open mind. We will question and challenge to ensure we achieve the right outcomes for customers and our people.

### Equality

We believe everyone is equal and expect our people to create positive experiences where everyone feels valued and included.

### Integrity

We will do the right thing and take responsibility for our actions. We will work together to uphold the highest standards of behaviour and practice.

## 2.0 Purpose

This social media policy is a document that outlines how Ark and its employees should conduct themselves online. It provides guidance around safeguarding Ark and its employees on social media and serves to educate employees on expectations for appropriate behaviour and professionalism. This policy applies both inside and, in certain circumstances, outside the workplace. For example, where Ark's reputation is brought into disrepute or breach of SSSC Codes of Practice.

## 3.0 Policy Statement

Ark recognises that the internet provides a unique opportunity to participate in interactive discussions and share information using a wide variety of social media platforms, such as Facebook, X, Snapchat, Instagram, LinkedIn, TikTok, Threads and blogs (this list is by no means

exhaustive but it shows the kind of platforms that are widely used). It is also a useful way of interacting socially with colleagues and friends. However, employees' use of social media can pose risks to Ark's confidential and proprietary information, and reputation, and can jeopardise its compliance with legal and regulatory obligations. To minimise these risks, to avoid loss of productivity and to ensure that Ark's ICT resources and communications systems are used only for appropriate business purposes, employees are required to adhere to this policy.

## 4.0 Scope

This policy applies to all employees including relief, volunteers, students and also board members, contractors and agency within Ark. For information on use of the internet at work refer to G15 Computer System, Email and Internet Policy. The policy applies regardless of whether the social media use takes place on or out with company premises, whilst travelling for work or working from home. It 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 Ark's ICT facilities and equipment or equipment belonging to the individual.

### 4.1 Definition of Social Media

Social Media is websites and applications that enable users to create and share content or to participate in social networking.

Social media sites and services include but are not limited to;

- Popular social networks like Facebook, X, Snapchat, TikTok, and Threads.
- Photographic social networks like Flickr, Instagram and Pinterest.
- Question and answer social networks like Quora.
- Professional social networks like LinkedIn and Yammer.
- Messaging services like Microsoft Teams, WhatsApp and Facebook Messenger.
- Online review sites like Indeed, S1 Job and Glassdoor.

This list is an example only and this policy will apply to any social media site or application as Ark see fit as social media progresses through time.

## 5.0 Legal/Regulatory Framework

This policy complies with the following legislation:

- Data Protection Act 2018
- The General Data Protection Regulation (GDPR) and the UK General Data Protection Regulation (UK GDPR)
- Freedom of Information (Scotland) Act 2002
- Malicious Communications Act 1988
- Communications Act 2003

- The Human Rights Act 1998

This policy adheres to the following regulatory framework and code of conduct in reference to Social Media Usage as set out by Scottish Federation of Housing Associations (SFHA), Scottish Housing Regulator (SHR) and Scottish Social Services Council (SSSC).

## 6.0 Responsibilities

### 6.1 Board of Management

Ark's Board of Management is responsible for consideration and approval of this policy.

### 6.2 Executive Team

Ark's Executive Team is responsible for ensuring that this policy is reviewed in accordance with Ark's schedule for review of policies, or sooner if required.

### 6.3 Operational Management Team

Ark's Operational Management Team is responsible for review of the policy and for ensuring that relevant measures are put in place in order to implement its requirements.

### 6.4 Managers

Ark Managers are responsible for the effective implementation of this policy. They must also ensure that each member of their staff, through induction, and team meetings, is made aware of this policy and that they comply with its terms.

### 6.5 All Staff

All staff are required to familiarise themselves with this policy and comply with its terms. Any misuse of social media should be reported to a manager. Questions regarding the content or application of this policy should be directed to the HR Team.

## 7.0 Social Media Usage

Social media should never be used in a way that breaches any of Ark's 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 Ark's ICT Policy;
- Breach Ark's obligations with respect to the rules of relevant regulatory bodies such as SFHA, SHR and SSSC;

- Breach Ark's Code of Conduct;
- Breach any obligations with respect to confidentiality;
- Breach Ark's Disciplinary Policy;
- Defame or disparage Ark or its affiliates, customers, clients, business partners, suppliers, vendors or other stakeholders;
- Harass or bully other employees in any way or breach Ark's Dignity and Respect at Work policy;
- Unlawfully discriminate against other employees or third parties or breach Ark's Equal Opportunities Policy;
- Breach Ark's Data Protection Policy (for example, never disclose personal information about a colleague, Supported People and Tenants on any social media platform as referred to in section);
- 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).

Employees should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, that can be attributed to Ark and create legal liability for both the author of the reference and Ark.

Employees who breach any of the above, will be subject to disciplinary action and ultimately could result in dismissal. For information, please refer to HR18 Disciplinary Policy and HR18a Disciplinary Procedure.

## 8.0 Social Media Accounts

### 8.1 Ark's Official Accounts

Use of any of Ark's corporate social networking site is for the purpose of sharing and disseminating information across the organisation. If employees are contacted for comments about Ark for publication anywhere, including in any social media outlet, direct the inquiry to the Chief Executive and do not respond without written approval.

Updating of Ark's corporate social networking sites may be accessed only by authorised personnel.

Employees are encouraged to 'share' the contents of Ark's corporate sites.

### 8.2 Personal Accountability and Responsibility

All employees are expected to behave appropriately and responsibly and should be aware that they may be accountable to Ark for actions outside of their work.

Employees are personally responsible for what they communicate on social media, and it is important that employees are aware that posting information on social networking sites in a personal capacity cannot be entirely isolated from their working life. Employees should

remember that what they publish might be available to be read by the masses (including Ark itself, future employers and social acquaintances) for a long time. This should be kept in mind before any content is posted.

Ark views any comment that is made on a social media site is made publicly, and that any inappropriate comment made, will be considered in the context of which it is made. For example, disparaging comments against a colleague made to all friends on Facebook could be viewed as bullying and/ or harassment, and/ or could potentially bring Ark into disrepute.

Employees may be accountable for actions outside of work, including making comments on social media sites, if that is contrary to any of Ark's policies, impacts on or compromises the employee's ability to undertake their role, or undermines management decisions. Such behaviour could be investigated and may result in disciplinary action being taken.

Employees must not access social networking sites during working hours unless specific permission is granted by the line manager.

Employees must not post information on a social networking or social media site that contains confidential information about Ark, fellow colleagues and/or Supported People or Tenants.

Employees must refrain from making reference on social media sites to the organisation, its employees, Supported People, Tenants and/or any external customers, suppliers and agencies unless it is of benefit to Ark e.g. sharing a job vacancy post, or participation posts.

Employees must not post entries on any of the sites as listed in Section 4.1 above that are derogatory, defamatory, discriminatory or offensive in any way, or which could bring the organisation into disrepute. Employees should also avoid social media communications that might be misconstrued in a way that could damage our business reputation, even indirectly.

Employees should avoid posting comments about sensitive business-related topics, such as Ark's performance. Even if employees make it clear that their views on such topics do not represent those of Ark, their comments could still damage the company's reputation.

Such posts as detailed in section 7.0 will not be tolerated and the employee may be subject to Ark's disciplinary process.

Employees are not permitted to post pictures of Supported People without prior permission from their line manager and guardians.

Employees are encouraged to use social media to support Ark's Vision and Mission.

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 work passwords and login details.

The above principles apply equally to information or comments posted by employees from their home (or other personal) computers and irrespective of whether the posts are done

during working hours or in the employee's own personal time. Posts also include messages, videos and images.

### 8.3 Respecting Intellectual Property and Confidential Information

Employees should not do anything to jeopardise Ark's valuable trade secrets and other 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, which can create liability for Ark, as well as the individual author.

Employees are not permitted to use the Ark's logos, brand names or other trademarks, or post any of Ark's confidential or proprietary information without prior written permission.

To protect themselves and Ark 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 Compliance & Improvement team before making the communication.

## 9.0 Monitoring and Usage

The contents of Arks ICT equipment and communications systems are, and remain at all times, the property of Ark. Therefore, all employees including relief, volunteers and students should have no expectation of privacy in any message, document, social media post, blog, discussion or any other information sent, received or stored on our ICT systems.

Ark reserves the right to monitor, intercept and review, without further notice, employee activities using Ark's ICT equipment and communication systems, including but not limited to social media postings and activities, to ensure that Ark's rules are being complied with and for legitimate business purposes. As an employee of Ark, you consent to such monitoring by Ark regardless of your use of social media resources and system.

Employees should not use Ark's ICT resources and communications systems for any matter that you wish to be kept private or confidential from Ark.

## 10.0 Related Policies & Procedures

- G03 Staff Code of Conduct
- G15 Computer System Security, Email & Internet Policy
- G15a ICT Systems Security
- G15b IT Systems Monitoring & Patching
- HR18 Disciplinary Policy
- HR18a Disciplinary Procedure
- G24 Data Protection Policy



## 11.0 Equality Impact Assessment (EIA)

No potential equalities issues have been identified in relation to the development of this policy, and consequently, an EIA has not been completed.

## 12.0 Data Protection Impact Assessment (DPIA)

A DPIA has been completed in relation to the development of this policy.

## 13.0 Stakeholder Consultation

In developing this policy the following groups were consulted:

- Ark Board of Management;
- Ark Executive Team; and
- Ark Operational Management Team.

## 14.0 Monitoring and Review

### 14.1 Monitoring

Ark's Executive Team and Operational Management Team will monitor the implementation of this policy on an ongoing basis.

### 14.2 Review

This policy will be reviewed within 3 years from the date of approval by our Board of Management, in accordance with Ark's policy review framework.