



18. Social Media And Interaction

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This policy sets out the Company's position on employees' use of social media both at work and in their own time and it should be read in conjunction with the Company's policy on Information Security and Technology in this Employee Handbook.

For the purposes of this policy, social media is a type of interactive online media that allows parties to communicate instantly with each other or to share data in a public forum. This includes online social forums such as Twitter, Facebook and LinkedIn. Social media also covers blogs and video- and image-sharing websites such as YouTube and Flickr.

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

18.1 Use of Social Media at Work

Employees are allowed to make reasonable and appropriate use of social media websites from the Company's computers or devices, provided that this does not interfere with their duties. To this end, employees must limit their use of social media websites to their official rest breaks such as their lunch break.

Employees may wish to use their own computers or devices to access social media websites while at work and in these instances, employees must again limit their use of social media websites to their official rest breaks such as their lunch break.

Employees are allowed to make reasonable and appropriate use of business orientated social media websites, such as LinkedIn, from the Company's computers or devices as part of their work. Employees should contact HR in order to find out the current permitted business social media websites and the guidelines relating to their use. Employees are not permitted to name or identify any of the Company's clients on LinkedIn or any other social media website. The Company reserves the right to require employees to delete any reference to any of its clients on any such websites.

18.2 Monitoring Use of Social Media during Work Time

The Company reserves the right to monitor employees' internet usage in compliance with applicable data protection laws, including the GDPR. Monitoring will be conducted transparently, with a focus on data minimisation and respecting employees' privacy rights. Employees should refer to the Monitoring Policy in this Employee Handbook. The Company considers that valid reasons for checking an employee's internet usage include suspicions that the employee has:

- Been using social media websites when he/she should be working; or
- Acted in a way that is in breach of the rules set out in this policy.

The Company will retain internet usage information for a period of six months, after which it will be securely deleted unless there is a lawful reason for extended retention. Any extended retention of data will be reviewed and justified on a case-by-case basis.

If automated or AI-driven systems are employed for monitoring purposes, the Company ensures that these comply with AI transparency requirements and are designed to mitigate bias in accordance with current AI legislation.

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

18.3 Use of Social Media both Inside and Outside of Work Time

The Company recognises that many employees make use of social media in a personal capacity. The Company does not object to employees setting up

personal accounts on social media sites in their own time, subject to the following conditions:

- Employees must not link their personal social networking accounts or activities to the Company's website. Any such links require the Company's prior consent;
- Employees should refer only to their position within the Company and must not refer to any specific client roles which they have undertaken. Employees must not name or identify any of the Company's clients, project names or specific roles undertaken for the client on behalf of the Company or any other project specific information on any form of social media;
- If reference is made to the employee's employment or to the Company, the employee should state to the reader that the views that the employee expresses are their views only and that they do not reflect the views of the Company. Employees should include a notice such as the following: "The views expressed on this website/blog are mine alone and do not reflect the views of my employer"; and
- Employees should always be conscious of their duty as an employee to act in good faith and in the best interests of the Company.

Any communications that employees make through social media must not:

- Bring the company into disrepute, for example by:
- Criticising clients, colleagues, suppliers or competitors;
- Making defamatory comments about individuals, the Company, its clients or other organisations or groups; or
- Posting images that are inappropriate or links to inappropriate content;

It is important to note that this may occur even if the employee has stated that his or her statement does not represent the views of the Company.

- Breach confidentiality, for example by:
 - Revealing company or client confidential information owned by the Company;

- Disclosing personal data or information about any individual that could breach the Data Protection Act; or
- Discussing the Company's internal workings or its future business plans that have not been communicated to the public;
- Breach copyright, for example by:
 - Using someone else's images or written content without permission; or
 - 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; or
 - Posting images that are discriminatory or offensive (or links to such content).

It is important to note that this may occur even if the employee has stated that his or her statement does not represent the views of the Company.

18.4 Disciplinary Action over Social Media Use

All employees are required to adhere to this policy. Breaches of this policy will be dealt with under the Company's Disciplinary Procedure. Employees should be aware that the Company regards breach of any part of this policy as gross misconduct that may result in disciplinary action up to and including dismissal without notice.

Employees should be aware that any information contained in social networking sites may be used as evidence, if relevant, to any disciplinary proceedings. If employees become aware of information relating to the Company posted on the internet, the employee should bring this to the attention of their manager.

18.5 Interaction with the Media

Employees who are contacted for comments about the Company for publication anywhere, including in any social media outlet, should direct the inquiry to the Operations Department and should not respond without written approval.

Even if an employee's duties require them to speak on behalf of the Company in a media or social media environment, they must still seek approval for such communication from the Operations Department, who may require them to undergo training before they do so and impose certain requirements and restrictions with regard to their activities.