



Social Media Policy			
Last Reviewed	March 2023	Next Review	June 2026
Responsible Officer	Chief Executive		

**Policy Statement:** Freebridge is committed to promoting a fair and consistent approach to managing and developing its people to be “the best that they can be”.

Freebridge shall provide all staff and their managers with guidance and practical advice on a wide range of employee matters, as well as opportunities and support to enable them to fully participate and contribute to Freebridge’s culture that is built upon strong values and commitment to continuous improvement.

This policy sets out Freebridge’s position on social media use and is considered a critical policy to all those identified in the Target Audience section below. In the current age, social media can be a very valuable asset to an organisation seeking to realise its full potential and corporate objectives. However, it can also be the cause of reputational damage and can significantly disturb the smooth running of operations. Freebridge are therefore committed to being very clear, as set out in this policy, how social media is to be adopted and used. Due to the impact that any deviation from this policy, any infringements of this policy (by anyone listed in the Target Audience section) will be investigated under the company’s disciplinary process.

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

You should be aware that there are many more examples of social media than can be listed here and this is a constantly changing area. You should follow this policy in relation to **any** social media that you use.

This policy applies to the use of social media for business purposes as well as personal use (including outside of your working hours) that may affect Freebridge in any way.

This policy does not form part of any employee’s contract of employment/any other agreement to work with Freebridge and it may be amended at any time.

## **Target Audience**

The scope of this policy goes wider than just employees and other staff members. It covers anyone who is connected with Freebridge and its activities including specifically board members, directors, office holders, committee members and volunteers as set out in the Target Audience (all employees, officers, consultants, contractors, volunteers, interns, casual workers, agency workers, office holders and board members, committee members and shareholders). Reference to “you” within this policy refers to the full Target Audience, not just employees and staff members.

## **Personnel responsible for implementing the policy**

The Leadership Team has overall responsibility for the effective operation of this policy but has delegated day-to-day responsibility for its operation to Director of People.

The HR department will monitor the effectiveness and review the implementation of this policy regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible and communicated to all employees, officers, consultants, contractors, volunteers, interns, casual workers, agency workers, office holders and board members committee members and shareholders.

Everyone working for Freebridge (in any capacity including but not limited to employees and board members) are responsible for the success of this policy and should ensure that they take the time to read and understand it.

Questions regarding the content or application of this policy should be directed to a HR Advisor.

## **Purpose and Scope**

Freebridge seeks to use social media in a positive way for communicating with customers, stakeholders and the general public in an informed, measured and proportionate way.

Managers, the Leadership Team and board members have a specific responsibility for operating within the boundaries of this policy, as well as ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements.

In addition, Freebridge may require any individual engaged with the organisation to undertake training on the appropriate use of social media in the workplace.

## **Compliance with related policies and agreements**

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 other policies i.e. a discriminatory comment in breach of our Equal Opportunities policy, it will also breach this policy. 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) breach our Anti-harassment and Bullying Policy;
- (f) breach our Equal Opportunities Policy;
- (g) breach our Data Protection Policy (for example, disclosing personal information about a colleague or customer online); or
- (h) breach any other laws or regulatory requirements.

Freebridge takes the rules and guidance set out within this policy very seriously. Individuals who breach this or any of the above policies may be subject to disciplinary action up to and including termination of employment. For those individuals that are not employed, their relationship with Freebridge could be terminated in the event of a breach of any of the above policies.

### **Personal use of social media during working hours**

Freebridge accepts that all colleagues, including those working for or with Freebridge (as listed in the Target Audience section) will need reasonable access to social media during working hours whether this is through an individual's personal device or using Freebridge's IT equipment. All colleagues and those listed in the Target Audience section are reminded that any personal use of social media during working time should be appropriate as detailed in point 5.

### **Guidelines for responsible work-related use of social media**

Any communications that you make in a professional capacity through social media must not:

- bring Freebridge into disrepute, for example (but not limited to) by:
  - criticising or arguing with customers, colleagues or rivals;
  - making defamatory comments about individuals or other organisations or groups; or
  - posting images that are inappropriate or links to inappropriate content;
- breach confidentiality, for example (but not limited to) by:
  - revealing trade secrets or information owned by Freebridge;
  - giving away confidential information about an individual (such as a colleague or customer contact) or organisation (such as a rival business); or
  - discussing the Freebridge's internal workings (such as deals that it is doing with a customer/client or its future business plans that have not been communicated to the public);
- breach copyright, for example (but not limited to) by:
  - using someone else's images or written content without permission;
  - failing to give acknowledgement where permission has been given to reproduce something; or
- constitute discrimination, bullying or harassment of any individual, for example (but not limited to) by:
  - making offensive or derogatory comments relating to sex, gender reassignment, race, disability, sexual orientation, religion or belief or

- age, pregnancy or maternity, marital and civil partnership, or gender reassignment;
- using social media to bully another individual (such as an employee of Freebridge); or
- posting images that are discriminatory or offensive or sharing links to such content.

If you see social media content that is disparaging, is offensive or reflects poorly on us, you should contact the People Team.

### **Social media in your personal life**

Freebridge recognise that many people make use of social media in a personal capacity outside of work. While you are not acting on behalf of Freebridge, you must be aware that you can damage Freebridge's reputation if you are recognised as working for or on our behalf (please see Target Audience section for further information). Social media postings in a personal capacity should be approached with caution as many people use social media and there is the potential for people outside your network/friend's list who can view your online activity.

To avoid the potential damage that could be sustained, you are not allowed to state that you work for Freebridge on any basis and in any forum aside from LinkedIn. This includes doing anything within any forum (aside from LinkedIn) that identifies you as being associated with Freebridge including but not limited to posting photos in work uniform, allowing such photos to be posted by other people or stating that you work for Freebridge in a comment. You should ensure that your social media profile and any content you post in your personal life is consistent with the professional image you present in your working life to customers, suppliers, colleagues and other organisations we work with or compete against.

You should also make sure that any postings on social media in your personal life do not breach confidentiality, copyright or constitute discrimination. For further information in this regard.

Some individuals (particularly board members and the Leadership Team) have a higher public profile than other individuals. These individuals may be listed on a number of different websites and documents as having an interest in or association with Freebridge. It is therefore of utmost importance that such individuals are mindful and live by the principles set out within this policy and set an example for others to follow.

### **Use of social media in the recruitment process**

We may use internet searches to perform due diligence on candidates in the course of recruitment.

## **Monitoring use of social media activity**

Freebridge reserves the right to monitor, intercept and review, without further notice, your activities using our IT resources and communications systems, including but not limited to social media postings and activities, for legitimate business purposes, which include ascertaining and demonstrating that expected standards are being met by those using the systems and for the detection and investigation of unauthorised use of the systems (including where this is necessary to prevent or detect crime). All monitoring will be conducted in accordance with our GDPR policy.

For IT equipment that is paid for by Freebridge, but which is owned by you, you agree to surrender such equipment for inspection and monitoring where there is reasonable suspicion of there being a breach of this policy. Such monitoring will only take place where there is reasonable suspicion that you have breached the rules set out in this policy or any other applicable policy.

## **Breach of the Policy**

You are required to adhere to this policy. You should note that any breaches of this policy may lead to disciplinary action or termination of our relationship with you (as applicable). Serious breaches of this policy, for example incidents of bullying of colleagues or social media activity that might cause serious damage to Freebridge, may constitute gross misconduct and lead to summary dismissal. Any member of staff, board member or other individual suspected of committing a breach of this policy will be required to co-operate with our investigation.

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.