Wheatley Group

Social Media Policy

Updated August 2017

Wheatley Group

1. Introduction

Wheatley Group recognises the potential of social media as a business tool. As information and communication technology continues to move forward, so too do the tools that enable us to communicate with and unite people.

"Social Media" is the term used for online tools, websites and interactive media that enable users to interact with each other in various ways, through sharing information, opinions, knowledge and interests.

It involves building online communities or networks, which encourages participation, dialogue and involvement.

Social media is integral to modern communications; its capabilities are already being exploited by central and local government and various public and private organisations as a method of engagement with customers, stakeholders and partners.

For social media to work effectively it is vital that it is used as part of the overall communications mix; to provide up to date information about our Group, our subsidiaries, our communities, the services we provide and our engagement activities. We use social media to support our business objectives, such as encouraging people to use online self-service, and to respond to business challenges, including engaging with harder to reach groups such as teenagers. Social media provides Wheatley with an opportunity to connect with communities, listen to what people are saying and engage with them in two way conversations.

It can empower local residents to have a voice about their needs and influence decision making, building trust and stronger communities.

However, we need to ensure our use of social media does not expose our Group to security risk or reputational damage and this policy and appended staff guidance sets out how we will manage and regulate our use of social media.

What this policy covers

Types of social media may include blogs; social networks; image, audio and video sharing sites; and other content sharing communities. Typical social media sites may include Facebook, Twitter, LinkedIn, Instagram, Snapchat, Yammer, YouTube and Vimeo. The format and levels of interaction vary greatly from one to another.

2. Wheatley Group Social Media Policy

Social media offers potential for building relationships and improving the services we provide. This policy will clearly set out how social media can be managed effectively and how any risks or pitfalls can be avoided or mitigated.

The aim of this policy is to:

- safeguard our Group and staff by identifying who is permitted to represent us on social media sites and to provide guidance to staff members who have their own personal social networking sites

- encourage good practice in using social media and ensure that users operate within existing policies, guidelines and relevant legislation

- support our Digital Inclusion agenda

- promote the effective and innovative use of social media as part of our Group activities. Where appropriate, the use of social media will become an integrated part of communications and engagement plans for projects, campaigns and consultations, both locally and Group-wide

- encourage and promote engagement with both individuals and local communities

- ensure that Group information remains secure and is not compromised through the use of social media

- ensure our reputation is not damaged or adversely affected.

Scope

Not everyone will be able to access social media sites during working hours. Staff wishing to access social media as part of their job can request to do so by presenting a business case in the first instance to their manager.

This policy applies to all staff, Board and Committee Members, and other workers (including placements and agency workers, secondees and contractors).

Wheatley Group Communications Team manages all proactive social media content produced on behalf of the Group. This is to ensure the content posted online is consistent with our core messages and values and that it does not conflict with information already being communicated through more traditional methods. The Communications Team also currently co-ordinates and handles responses to customers' posts on social media with the help and support of frontline and Group colleagues. All employees in Wheatley have a responsibility to provide information timeously and accurately for appropriate responses to be developed by the Communications Team for social media. There are internal and external social media tools. All Group staff have unlimited access to internal social media tools on our

intranet (subject to the normal policy guidance on appropriate use of electronic communication). This allows staff to communicate with each other internally.

From time to time, access to Facebook and Twitter pages may be required for business purposes during work hours for specific members of staff. In these circumstances, nominated staff should follow any guidance or instructions issued by our Group in relation to postings or comments made on those sites, including the guidelines attached to this policy.

Specific guidelines for all staff have been developed on the use of social media tools, including personal use. These guidelines have been designed for staff who use social media for business and personal purposes and are attached to this policy (Appendix 1).

3. Policy Statement

This Policy provides a structured approach to using social media and will ensure it is effective, lawful and does not compromise our Group information or computer systems/networks.

Users must ensure they use social media sensibly and responsibly, in line with our policy. They must ensure their use will not adversely affect our Group or its business, nor be damaging to our reputation and credibility or otherwise violate our policies.

Benefits

Social media offers potential for building relationships and improving the services we provide. Benefits of using social media include the following:

- Provides a channel that is immediate, direct and allows fast dissemination of information – particularly useful during any kind of disruption to services
- Attracts and engages with tenants, customers and stakeholders by bringing messages to life with video/audio/images
- Understands and responds, where appropriate, to customers' complaints, compliments or problems
- Communicates campaign key messages in a cost-effective way
- Provides another option for tenants and customers to contact us when it suits them
- Reaches out to wider UK social housing audience – sharing our success stories
- Provides opportunity to build online communities which are location specific (areas, even streets), so that we can share information and engage with individual communities
- Increases positivity around our brand as 'followers' or 'friends' become brand advocates
- Increases access to communities, for example young people
- Encourages engagement between staff to share information and learning, knowledge management via the staff intranet
- Provides opportunities for stakeholders, for example politicians and media to comment, and our Group to provide immediate response.
Allows us to measure and evaluate reach and engagement levels.

As with any online activity there are often risks associated:

Risks

- Improper/incorrect posting of information on internal and external social media sites (including on individual's own time)
- Increased risk of viruses/malware (malicious software)
- Risk to staff where they identify themselves as working for Wheatley Group
- Disclosure of confidential information
- Social engineering attacks (this is the act of manipulating people into disclosing confidential material or carrying out certain actions. Social engineering is often conducted by individuals fraudulently claiming to be a business or client)
- Civil or criminal action relating to breaches of legislation
- Breach of Safeguarding.

Risk management/mitigation

- Monitoring of social media by the Wheatley Communications Team.
- Awareness of individuals' social media responsibilities via Social Media policy rollout including induction, Teamtalk, mandatory read/check.
- Sufficient antivirus/anti- malware protection to render risk minimal and acceptable.
- Guidelines to safeguard staff on the use of social networking sites are included as part of the Social Media policy.

4. Policy Details

Social media will be made available for business use only, subject to approval.

Responsibilities of Board and Committee members, and staff

The following guidelines will apply to online participation and set out the standards of behaviour expected as a Wheatley Group representative.

- Be aware of and recognise your responsibilities identified in the Social Media Policy
- Remember that you are personally responsible for the content you publish on any form of social media
- Never give out personal details such as home address and telephone numbers. Ensure that you handle any personal or sensitive information in line with our Group Data Protection Policies.

Be aware of Safeguarding issues, as social media sites are often misused and safeguarding is everyone's business – if you have any concerns about other site users, you have a responsibility to report these.

- Respect copyright, fair-use and financial disclosure laws.
- Social media sites are in the public domain and it is important to ensure that you are confident about the nature of the information you publish. Permission must be sought if you wish to publish or report on meetings or discussions that are meant to be private. Individuals must not be identified without their approval.
- Don't use insulting, offensive or racist language or engage in any conduct that would not be acceptable in the workplace. Show consideration for others' privacy and for topics that may be considered objectionable or inflammatory – such as politics or religion and in relation to staff the Dignity at Work Policy applies.
- Don't download any software, shareware or freeware from any social media site.

Further guidelines have been appended to this policy.

Responsibilities of staff

Authorised staff using social media must be aware of and comply with Wheatley Group Guidelines and Employees' Code of Conduct.

Staff must identify themselves as being part of Wheatley Group and use only Wheatley email addresses and not personal ones.

If a member of staff receives any threats, abuse or harassment from members of the public through their use of social media they must report such incidents using our Group Accident, Incident and Near-Miss Reporting procedures.

Staff should also refer to the Unacceptable Actions Policy which outlines how Wheatley Group and subsidiaries will manage customers or tenants whose actions or behaviours towards staff is considered unacceptable, including through social media.

Use by Board and Committee Members

Board and Committee Members should ensure that they are familiar with the guidance set out in this policy and that their use of social media does not put our Group information and security systems at risk, or damage our reputation. Board and Committee members should also be familiar with Board and Committee Code of Conduct, which outline key information and guidance on best practice issues such as information handling and security.

Personal Use

This policy refers to the business use of social media. Staff who have been granted access to social media sites should not use social media sites for personal reasons.

Staff should be aware that Staff Code of Conduct covers the issue of fidelity and information disclosure and should bear this in mind when using social media (in a personal capacity) outside work. Staff should be aware that any reports of inappropriate activity linking them to Wheatley Group will be investigated.

Appendix 1 (Guidelines for staff) outlines the legal considerations which arise through employees' use of social media and it is important that staff refer to and familiarise themselves with this guidance. Failure to comply with the guidelines could result in disciplinary action being taken.

Responding to customers

Wheatley Group Communications Team manages social media content produced on behalf of the Group and carries out strict monitoring of social media daily.

We do not respond to posts on social media which contain offensive language, for example swearing or sectarian, sexist or racist comments. These posts are removed or hidden.

In general we respond, where appropriate, to customers' complaints, compliments or problems, timeously. All customer complaints are responded to as quickly as possible and always within 24 hours Monday to Friday. Comments posted at the weekend are responded to on the first working day after the post is made.

All staff have a responsibility to work with the Communications Team to provide information.

Where, based on the Communications Team's professional judgment, it is not appropriate to comment on a post, either because it would involve releasing

confidential information or creating additional unnecessary and undue attention to an issue, the Communications Team continues to monitor the social media reaction. They then intervene if and when it is right to do so, for example to set the record straight or counteract misinformation which is gaining traction through shares, retweets and comments.

Complaints will be dealt with in line with our Group Complaints Policy guidelines.

Monitoring

The contents of our IT resources and communications systems are Wheatley Group property. Therefore, staff should have no expectation of privacy in any messages, files, data, document, 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.

In accordance with agreed process for monitoring IT usage by individual staff members, we reserve 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. 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 network monitoring technologies.

Sustainability Implications

This policy supports our Digital Inclusion Strategy and our vision of "Making Homes and Lives Better". The regulated use of social media has the potential to make a positive impact on communities and social wellbeing. By establishing greater links with members of the public, community groups, partners and stakeholders, through social networking, there is scope for more open communication and the increased ability to share information and to improve service delivery.

Social media is a cost effective resource that can be used to tackle a wide range of issues and to influence change.

Links with other policies

This policy is linked to Wheatley Group's Digital Inclusion, Communications and Community Governance Strategies and Unacceptable Actions Policy.

Breaches of Policy

Any breaches may lead to access being withdrawn and disciplinary action being taken. Serious breaches of this policy by staff will amount to gross misconduct and may result in dismissal.

Other violations of this policy, such as breaching the Data Protection Act, could lead to fines being issued and possible criminal or civil action being taken against Wheatley Group or the individual/s involved.

Legal and regulatory framework

The following legal documents are relevant to this policy:
- Data Protection Act 1998
- Freedom of information Act 2000
- Human Rights Act 1998.

Anyone who uses social media and holds, shares, refers to or uses i.e. processes personal information must comply with the eight principles of the Data Protection Act 1998. This Act ensures personal information is:
- fairly and lawfully processed
- processed for limited purposes
- adequate, relevant and not excessive
- accurate and up to date
- not kept longer than is necessary
- processed in line with the individuals rights
- secure
- not transferred to other countries without adequate protection.

Copyright protects the right of the author to control the production and use of copyright material. For staff protection and our Group's protection, staff using social media should do so without infringing the copyright of others, including our own copyrights and brands. In some situations it might be possible to use copyright material where only a short excerpt of someone else's work is used and the author or source of the material is linked.

Effectively managing and protecting our Group's confidential information and "trade secrets" for example business performance, is critical and the responsibility of all Group staff, contractors and partners. Confidential information and trade secrets are part of our assets.

Failure to effectively manage and protect our own and our contractors', partners' and suppliers' confidential information may result in tenant and customer complaints, regulatory enforcement action or fines, breach of contract, damage to business relations and damage to Wheatley Group's reputation. Failure to prevent disclosure or reference to court proceedings, including pending proceedings, may prejudice those proceedings.

Effective management of the physical security of our Group intellectual property is critical and the responsibility of all Group staff, contractors and partners. The sharing of this type of information on social media sites may compromise the security of a building or complex.

Policy review

The Social Media policy is subject to regular review to ensure it is up to date with developing technology and online social tools. A review will also be necessary following changes to legal, regulatory or best practice. As a minimum, it will be reviewed every six months but will be within three years. Reviews will be approved by the Executive Team.

Appendix 1: Guidelines for Staff

We recognise that the internet provides 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, employees' use of social media can pose risks to our confidential information, our reputation and it can also jeopardise our compliance with legal obligations.

To minimise these risks we expect all staff to adhere to these guidelines as well as the Social Media Policy. These guidelines do not form part of any employee's contract of employment and can be amended from time to time.

This guidance is for all staff using social media, including Facebook, Twitter, and all other social media networking sites and/or the collaboration elements of the staff intranet. This guidance also covers all other internet postings, including blogs.

This guidance applies to the use of social media for business and personal purposes, whether during office hours or otherwise and regardless of whether social media is accessed using our IT facilities or equipment belonging to staff.

1.   Be responsible for what you write

Exercise good judgment and common sense when making comments online.

It's okay to have opinions but don't do so in a way that may not be appreciated by your audience or may damage Wheatley's reputation. If you're in doubt about whether or not you should post a comment, this will usually mean that the post or comment is not appropriate.

To give you some guidance on how to exercise good judgment, here are some examples of what not to do:

Staff should never post any disparaging or defamatory statements about:

- our organisation;
- our customers and tenants;
- our suppliers and business partners; and/or

- our stakeholders and other affiliates.

You should also avoid any social media communications that might be misconstrued in a way that could damage Wheatley's reputation, even indirectly.

Do not post anything that your colleagues or customers would find offensive, including discriminatory comments, insults or obscenity. This means always be nice, truthful and respect the other individual(s). Never embarrass or make fun of others online. Workplace bullying includes comments made online, even in your private social networks or out of office hours.

Refrain from making any comments that could be interpreted as demeaning, inflammatory or judgmental, or likely to cause injury or upset to another person.

You should never post anything that relates to our tenants, customers, business partners, suppliers or stakeholders, nor should you make any comments which these people might find offensive or inappropriate or which might damage their reputation.

2.   Never reveal too much information

Never reveal confidential or sensitive information about yourself, your colleagues or Wheatley to anyone online. Don't re-post internal communications as these are not for public consumption. All employees within Wheatley Group already have a confidentiality clause included within their Contract of Employment and employees should be mindful of this when using social media.

3.   Remember that cyberspace links your professional and private lives

If you have personal social media sites such as Facebook and Twitter and receive friend requests from people who you know are Wheatley Group customers, consider whether you know them well enough to accept them as friends.

You should also consider whether you need to tell people where you work. If you decide to do so friends and customers who find your private Facebook page and personal Twitter account, may draw their own conclusions. Be cautious before putting anything 'out there' as it may damage our reputation or otherwise breach these guidelines.

If you do identify where you work and make comments on Wheatley business we would recommend that you use a disclaimer such as "The views expressed on this site are my own and in no way reflect the views of Wheatley Group". However, this does not itself exempt staff from personal responsibility.

You should not use our organisation's logos, brand names, slogans or other trademarks – this is all property of Wheatley, and should not be used by staff for personal social media profiles.

4.   Engage honestly and truthfully

If you cannot help someone directly send them to the appropriate department, person or social media channel.

Follow up personally or make sure a colleague does so. Make sure that you provide updates to the customer as/when required. Aim to resolve the majority of enquiries within 5 working days but let the customer know if this is not going to be possible. In today's virtual world time is of the essence.

Remember that only authorised members of staff are allowed to post comments using the organisation's social media profiles. These staff members must follow these guidelines and, in any event, receive authorisation from their manager before posting content on Wheatley's behalf.

5.   Verify your privacy and security settings

How much, or how little, information you reveal – such as email or phone number – should be set in your security options or privacy settings (e.g., what information is visible to anyone).

Consider whether you really need to tell people where you work. If you make inappropriate comments or share racist/sectarian/offensive/obscene/sexually suggestive/harassing/sexist/pornographic/discriminatory material that a tenant or other member of staff sees, this may lead to a complaint which may, in turn, lead to you being disciplined.

Before you post any images or videos online on any internal Wheatley social media site, staff should be mindful of this guidance and ensure compliance.

6.   Watch the clock when using social networks

Access to social media sites is restricted on Wheatley IT systems. However many staff will be able to access these sites using their personal mobile phones. Visiting your personal Facebook/Twitter page takes time away from getting tasks done for which you get paid; accordingly, use your time wisely while at work and make your social media engagement beneficial to the company. Access to personal sites, regardless of how you access them, should be limited to break/lunch time. Please do not let such usage interfere with maintaining your high performance. When using Wheatley social media sites make sure you maintain a good balance between this and the rest of your work. This applies to phones, tablets and PCs.

Remember that you are not allowed to use Wheatley systems or equipment to access external social media sites such as Facebook and Twitter, unless you have specific authorisation to do so in order to perform your duties.

7.   Disciplinary Action

All Wheatley staff are expected to comply with the terms of this policy. Disciplinary action (up to and including dismissal) will be taken against any employees who fail to do so, in line with the appropriate disciplinary policy.

You should be aware that disciplinary action may be taken regardless of whether the breach of these guidelines is committed during working hours, and regardless of whether you use personal equipment to access the relevant sites. Any member of staff suspected of committing a breach of these guidelines or the Social Media Policy will be required to cooperate with our investigations, including allowing us access the social media in question.

Staff may also be required to remove internet postings which are deemed to constitute a breach of these guidelines or the Social Media Policy. Failure to comply with such a request may in itself result in disciplinary action.

Employees may face disciplinary action where, following appropriate investigation, they have found to have:

- Posted comments and/or images on Wheatley/personal social media sites that others have found to be offensive
- Been responsible for serious breaches of security or confidentiality, including misuse or disclosure of confidential information via social media
- Used Wheatley/personal social media in a way that has brought Wheatley into disrepute
- Used Wheatley/personal social media in a way that has offended or damaged the reputation of our tenants, customers, suppliers, business partners, stakeholders or other affiliates
- Deliberately misused Wheatley's property (including computer facilities e.g. email, social media and internet);
- Made negative comments about any of the Wheatley Group organisations, our business activities or an employee of any of these organisations;
- Breached any of the following Wheatley policies or obligations through posting of content on social media:
    - our electronic communications policy;
    - our obligations to the Scottish Housing Regulator;
    - our confidentiality obligations to third parties;
    - our Dignity at Work Policy;
    - our Employee Code of Conduct;
    - our Equal Opportunities Policy; and
    - our Data Protection Policy.

This list is not exhaustive.

8.   Unacceptable Actions Policy

If you are subject to threatening or inappropriate posts on social media from customers or colleagues you should immediately report this to your line manager or a senior member of staff. In addition you must complete the Accident, Incident and Near Miss form. This will be dealt with in a manner consistent with our core values and the Unacceptable Actions Policy. You will also be supported through Optum

(livewell.optum.com), our Employee Assistance Programme. Full details are available on Holmes.

9.   Monitoring of Social Media

The content of social media sites operated by Wheatley Group is monitored by Wheatley Group staff. All users of our social media sites are subject to house rules which include removal of offensive or unacceptable posts. If you have any concerns regarding the posts on our social media sites talk to your manager or a member of the Communications Team.

10.   Remember

- What you publish is searchable and will be public for a long time
- What you write is your responsibility
- If you have concerns about what has been posted on social media sites speak to your manager.