Media, Social Media & Network Policy

Prepared by	Corporate Manager
Policy created	December 2023
Date of last review	December 2023
Date of current review	May 2025
Date of next review	May 2028
Reviewed by	Audit & Business Sub-Committee

Corporate Fit	Internal Management Plan	✓
	Risk Register	✓
	Business Plan	✓
	Equalities Strategy	✓
	Legislation	✓

Keep in touch

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Alternative formats available

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Раді перекладати
Ni Fahari kutafsiri
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ਅਨੁਵਾਦ ਕਰਨ ਵਿੱਚ ਖੁਸ਼ੀ
乐意翻译

Our corporate employment policies provide a framework to underpin our vision and values, to help our employees and leaders to achieve our strategic objectives.

Our Vision

Local people, local control.

By providing quality homes and services, we will create stronger communities and a better quality of life for our customers.

Our Values

- Focused on the needs of our customers and communities.
- Supportive of our staff and Committee members.
- Responsible, efficient, and innovative.
- Open and accountable.
- Inclusive and respectful.
- Fair and trustworthy.

Strategic Direction

Consolidation and improvement: Applicable to our core business as a landlord & property manager.

Growth: Through the new build opportunities we are taking forward.

Partnerships: Where this can help to address shared goals and increase capacity and value.

Resilience: A key priority across all parts of our business.

Strategic Objectives

Services	Deliver quality, value for money services that meet customers' needs.
Homes & neighbourhoods	Provide quality homes and neighbourhoods.
Assets	Manage our assets well, by spending wisely.
Communities	Work with local partners to provide or enable services and activities that benefit local people and our communities as a whole.
Our people	Offer a great workplace environment that produces a positive staff culture and highly engaged staff.
Leadership & Financial	Maintain good governance and a strong financial business plan, to ensure we have the capacity to achieve our goals.

Our Equalities and Human Rights Commitment

We understand that people perform better when they can be themselves and we are committed to making the Association an environment where employees can be open and supported. We promote equality, diversity and inclusion in all our employee policies and procedures to ensure that all employees are treated equally and that they are treated fairly on in relation to the protected characteristics as outlined in the Equality Act 2010.

Transparency Statement

As your employer we will collect and process personal data relating to you to manage our contract with you. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations with you. Further information about this commitment can be found within our Employee Transparency Statement.

Policy Scope & Review

For the purpose of this policy the term Association will include all members of the Tollcross Housing Association Limited. Therefore, all employees of the will be expected to adhere to this policy and/or procedure. All corporate employment policies and procedures are reviewed every 3 years in line with best practice and current legislation. The Association reserves the right to make additions or alterations to this policy and procedure from time to time and employees will be notified of any such additions or alterations. Any timescales set out in this policy may be extended where required.

Contents

1. Introduction

1.1. We recognise and embrace the benefits and opportunities that social media and networking can bring to the work that we do, not only to our customers but to the wider community.

1.2. Our approach to social media and networking is in line with our Customer Engagement Strategy and Action Plan, where we aim to have a range of ways you can engage, communicate, impact on decision making, and generally 'get involved' with us.

1.3. Social media and networking refer to any online (web or app based) tool which encourages participation, interaction, and exchanges in a public forum. This can also include group discussions tools such as WhatsApp. We will use the generic term 'social media' for the remainder of this policy to cover all these platforms and networking sites.

1.4. Social media platforms and technologies are always changing, and we will adapt our communication approach as and when required to meet our customers' changing needs.

2. Purpose & scope

2.1. The aim of this policy is to provide a clear framework for social media use, including but not limited to:

- employee responsibilities and obligations
- guide to social media use
- how we will respond to misuse

2.2. The policy will also provide a clear process for photography and filming during Association events, including, notification, signage, usage and storage.

2.3. This policy does not form part of any employee's contract of employment and may be amended at any time. Any changes will be communicated to employees prior to becoming effective.

3. Responsibilities

3.1. Employees are allowed to make reasonable and appropriate use of social media websites from the Association's computer network in order to carry out duties in relation to their job role (e.g. share / promote work carried out by partners we work with), provided that this does not negatively impact on their day to day duties and work performance.

3.2. Employees should not spend an excessive amount of time whilst at work using social media sites, even for legitimate business purposes, and should limit their personal use to official rest breaks.

3.3. Where an employee is engaging in social networking for work purposes (e.g. promotion of events or news), they must adhere to the guidelines identified in section 4.

3.4. Employees must not claim or imply that they are speaking on the Association's behalf unless permission is granted to do so (or this responsibility is detailed in their job role).

3.5. Employees must not make any social media communications that could damage the reputation or any business interests of the Association, whether directly or indirectly, on either Association social media channels or personal channels.

3.6. Employees must not use their Association email address when registering in a personal capacity for social media sites.

3.7. Employees must adhere to all other Association policies and procedures when operating on social media platforms, including but not limited to: Equality & Human Rights, Code of Conduct, Dignity at Work, ICT Acceptable Usage, and Data Protection.

3.8. We will not actively monitor employees' personal social media channels. However, where potential misuse is reported to us (either through an employee or customer), we have a duty to investigate these claims. This may result in the Association checking an employee's personal social media channels.

3.9. Any misuse or inappropriate behaviour will be dealt with in line with the Association's Disciplinary Policy (and may result in dismissal in serious cases).

4. Guidelines for social media use

4.1. Employees specifically engaged in social networking to promote the Association should use the following safeguards:

- Make sure that the communication has a purpose and a benefit for the Association.
- Ensure that content does not:
  - bring the Association or our community into disrepute.
  - breach confidentiality.
  - infringe copyright or any other legislation.
- Ensure the content could not be considered discriminatory, offensive, defamatory, or derogatory.
- Appropriate consent forms are in place for children under age 16 (as per guide detailed in appendix 2) before posting any images they are in.
- Never share personal details, or express personal opinions on sensitive matters.
- Ensure any information shared is correct and factual.

4.2. Posts or messages should be clear and easily understood. A conversational tone is appropriate for social networking. However, care should be taken to ensure messages are not misconstrued. For example, care should be taken when using local colloquialisms.

4.3. When engaging in online conversations, employees should engage honestly and truthfully. Online conversations are acceptable for sharing of basic information (e.g. what time an event starts, where is the event, etc.). However, the 'respond once, then step away' approach should be generally adopted.

4.4. The 'respond once, then step away' approach is to help avoid online back and forth or debates. Where appropriate, customers will be encouraged to contact an employee directly to discuss matters requiring a more in-depth discussion.

5. Misuse of social media channels by external stakeholders

5.1. We will actively monitor our social media channels to ensure there is no misuse. Where misuse, such as derogatory comments, are identified we will remove the offending posts as far as reasonably possible.

5.2. We will not respond to posts on social media which contain offensive language, for example swearing or sectarian, sexist or racist comments. These posts will be removed and will not be 'approved' for public viewing.

5.3. Any misuse directed at an individual employee will be dealt with in line with our Unacceptable Actions and/or Aggression & Violence at Work Policy.

5.4. Our social media sites will not be considered formal routes for complaint and all customers wishing to complain will be made aware of the Association's processes. Complaints will be dealt with in line with our Complaints Policy.

6. Photography and filming (images)

6.1. We recognise that sharing photographs and films of our activities and events can help us celebrate our achievements and raise awareness of our organisation. We understand that we must balance this with the right of our customers, service users, and other stakeholders not to have their image shared.

6.2. We will follow the below process when photographing and filming an event:

6.2.1. Advertising – we will ensure that all advertisements for events and activities will include notification if photographing and/or filming will be taking place.

6.2.2. Notice – we will ensure that posters (appendix 3) are displayed at all events and activities, confirming photographing and/or filming will be taking place and how to inform the Association where an individual does not wish to have their image taken (i.e. opt-out option).

6.2.3. Consent – we will ensure the correct consent is in place for the purpose of images. Where an individual has identified themselves as wishing to opt-out, an identifier (e.g. badge, sticker, etc.) will be used to ensure to allow for easy identification and we will not use this individual's images for any purpose.

6.3. We will adhere to the following levels of consent for different images (this does not include those who wish to use the opt-out option):

Crowd images and images where individuals can't be identified.	We will use 'legitimate interest' for these images and use them for both event celebrations and promotional purposes.
Posed images and group images (adults only).	We will use 'legitimate interest' for these images and use them for both event celebrations and promotional purposes.
Posed images and group (including children).	We will use 'legitimate interest' for these images and use them for event celebrations. For images we wish to use for promotional purposes, we will use 'explicit consent' and gain written permission (appendix 2).

6.4. Where 'explicit consent' is sought, we will hold the required permission alongside the image. Where an individual withdraws consent, the image will be removed from digital platforms. However, where the image has been used in distributed printed materials, we will not re-print those materials.

6.5. Where 'legitimate interest' is used to share images (for both promotional and celebration purposes), people appearing in the images can request that we remove it from our digital platforms, and we will honour this request.

6.6. We use photography and filming for the following reasons:

6.6.1. Event celebrations
We will only use these images for the celebration of that specific event or activity. The images will only be used for articles directly relating to the event and not wider promotional purposes. Once these images have been shared, we will no longer hold them on our internal systems (i.e. the images will be deleted).

6.6.2. Promotional purposes
Where we have taken images at events or activities, we may use them for wider promotional purposes (beyond event celebrations). However, we will seek consent before using the images for wider promotional purposes. Where these images have children in them, we will seek consent from a parent or guardian before using the image for promotional purposes.

7. Breaches of policy

7.1. 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.

Appendix 1 – Equality Impact Assessment

Policy	Social Media Policy		
EIA Completed by	Corporate Services	EIA Date	

1. Aims, objectives and purpose of the policy / proposal

The aim of this policy is to provide a clear framework for social media use, including but not limited to: employee responsibilities and obligations, guide to social media use, and how we will respond to misuse.

2. Who is intended to benefit from the policy / proposal?

Customer and the general community.

3. What outcomes are wanted from this policy / proposal?

Our approach to social media and networking is in line with our Customer Engagement Strategy and Action Plan, where we aim to have a range of ways you can engage, communicate, impact on decision making, and generally 'get involved' with us.

4. Which protected characteristics could be affected by proposal?

☐ Age	☐ Gender reassignment	☐ Religion or belief
☐ Disability	☐ Marriage & civil partnership	☐ Sex
☐ Race	☐ Pregnancy and maternity	☐ Sexual orientation

5. If the policy / proposal is not relevant to any of the protected characteristics listed in part 4, state why and end the process here.

As an additional way to engage with our customers, it does not impact protected characteristics. It will add an option for customers and will not replace any ways we currently engage / communicate.

6. Describe the likely impact(s) the policy / proposal could have on the groups identified in part 4

7. What actions are required to address the impacts arising from this assessment? (This might include; collecting data, putting monitoring in place, specific actions to mitigate negative impacts).

8. Consider the impact and actions to be considered for the following Human Right articles:

Article 6: Right to a fair trial Everyone should be given the opportunity to participate effectively in any hearing of their case and present their side.	
Impact: No impact.	Actions:
Article 8: Right to respect for private life, family life & the home Everyone has the right to access and live in their home without intrusion or interference.	
Impact: No impact.	Actions:
Article 14: Prohibition of discrimination Everyone has equal access to the other rights contained in the Human Rights Act.	
Impact: No impact.	Actions:

Appendix 2 – Photography & filming guide and consent form

I consent to Tollcross Housing Association using photographs and/or video recordings to promote the Housing Association. These images could be used in print and digital media formats including print publications, websites, e-marketing, posters banners, advertising, film, and social media.

I understand that images on websites can be viewed throughout the world and not just in the United Kingdom and that some overseas countries may not provide the same level of protection to the rights of individuals as EU/UK legislation provides. I understand that some images or recordings may be kept permanently once they are published.

I have read and understand the conditions and consent to my images being used as described.

Print name:			
Sign:		Date:	

Consent form for children aged 16 and under

For any children aged 16 and under, please confirm permission below.

Child name	Permission granted by (name of parent, guardian, or carer)	Sign	Date

We are committed to processing information in accordance with the UK General Data Protection Regulation (UK GDPR). The personal data collected on this form will be held securely and will only be used for administrative purposes. You can ask us to stop using your image at any time, in which case we will not use it in any future publications but may continue to appear in publications already in circulation. More information can be found in our Privacy Statement (on our website).

TOLLCROSS
housing association limited

Photographs and/or film footage will be taken at today's event.

These images will be used by Tollcross Housing Association for promotional purposes, which may include printed publications, press releases, websites, social media, posters, banners, and any other marketing by Tollcross Housing Association. They will be stored securely and will not be kept longer than they are needed for.

If you would prefer for you or your child, not to be photographed, please speak to an employee of Tollcross Housing Association.

For further information about what we do with your image or data, read our Privacy Statement online at www.tollcross-ha.org.uk.

Get in touch
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