

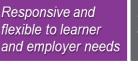


2023 POLICY









Encourage and support high aspirations

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1. Introduction

It is increasingly common for individuals to have some sort of "personal web content", such as a blog, a Twitter account, a profile on a social networking site such as Facebook, or video clips on user-generated sites such as YouTube. This media is public and therefore has a potentially unrestricted audience.

As an organisation we have to ensure that the reputation and well being of our business, its employees and its customers is maintained at all times, along with the integrity of our policies, confidential information, and the security of our goods and premises.

What is a blog?

Blogging and content on social networking sites usually involves the exchange of frank and open opinion. As work is such a big part of people's lives it is to be expected that bloggers may use their personal blogs or networking sites to discuss their work. These guidelines are not intended to unduly restrict personal blogging or creation of web content, but to set out the framework within which such activity may take place.

Scope of the guidelines

These guidelines apply to personal blogs and all other personal web content, including on social networking sites, and are intended to regulate the way in which our employees may refer to their work or use information relating to their work with us on such blogs or other web content. Blogs or websites which do not identify the blogger as an employee of our organisation, do not discuss our organisation and are purely about personal matters would normally fall outside these guidelines.

However, when a blogger clearly identifies themselves as an employee of our organisation and/or discusses their work, we expect them to act in ways that are consistent with the general standards of conduct and performance that govern their employment with us. This applies even if the internet activity is carried out in your own time, on your own equipment, and not at work.

In particular, if you are writing a blog or other web content please make sure that this complies not only with these guidelines but also with our confidentiality safeguards set out in the Employee Handbook, e-safety policy and email & internet usage policy and does not infringe any other relevant workplace rules and policies such as our equality, diversity and inclusion policy. Failure to do so may result in disciplinary action, up to and including dismissal, being taken against you.

Any serious breach of these guidelines including, but not limited to, posting any offensive, defamatory or discriminatory content on any social network or blog and any conduct which detrimentally impacts upon your suitability for your job, causes us to lose faith in your integrity, harms the reputation of our business or results in adverse publicity to our business may be considered gross misconduct by the Company, entitling it to dismiss without notice or pay in lieu of notice.

Guidelines for use

- You must not use our computer equipment to produce and must not write any personal web content while at work. You may however use such equipment to enable you to use and interact with the Company's own social media pages such as Twitter and Facebook which are appropriate to, and in accordance with, your role and these guidelines. If you are unsure on what is appropriate or not, please discuss this with your manager in advance of any publications being made.
- If you are using social media sites for permitted professional purposes, you must not act in a way which may breach the copyright or other intellectual property right of others. An example would be reposting user generated content without the author's permission.
- If you use sites such as Linked In for professional purposes at work, you should be aware that data stored on the Company's equipment remains the property of the Company at all times, including after the termination of your employment.
- The rest of these guidelines apply to your personal web content (including, where relevant, where this is produced using your personal equipment and/or outside of working hours).
- You should not use a work e-mail address when registering on social media sites other than for the purpose of participating in a permitted professional networking forum.
- You should not use your blogs to attack or abuse colleagues. The web is not the appropriate way to deal with issues that are affecting you at work. These should be discussed with your manager or raised through the formal grievance procedure.
- Remember that if you break the law on your blog or in your social media content (for example by posting something defamatory), you will be personally responsible.
- You should not reveal any confidential or commercially sensitive information that you are aware of because of your employment with us (for example, something that has been disclosed to us by a learner/employer).
- You should not disclose personal or sensitive personal data or information about employees, learners or others that you have access to at work: this could breach the Data Protection Act 1998 and General Data Protection Act (GDPR) May 2018.
- You should not use your blog or web content to encourage other employees to breach the terms of their contracts of employment or any Company policy or otherwise disrupt the Company's business.
- You should not make any comments or engage in any activity that could defame, or bring into disrepute, our organisation, its employees, learners or customers or otherwise negatively affect our relationship with third parties.

This includes, but is not limited to, any comments about our training and services which could damage our reputation in the market.

- You should be aware that disparaging comments about work colleagues, learners or others could also amount to harassment, discrimination or victimisation which would be a breach of our Equality, Diversity and Inclusion policy and could also result in personal liability.
- If, through viewing information on the web, you discover personal details about a colleague such as their sexual orientation, marital status, hobbies, religion or other beliefs, this is irrelevant in the workplace and should not influence your behaviour towards them. For more information please refer to our Equality, Diversity and Inclusion policy.
- Even if you do not directly say that you are our employee, remember that this may be obvious from the context of other things you say or post for example, if a photo shows your work clothing or equipment.
- Respect the privacy and feelings of colleagues and customers at all times (if in doubt, think about how you would feel if someone wrote the same things about you?).
- Do not publish photos of staff members without their permission or any photos which could be damaging to the business interests or reputation of the business.
- If your blog or social media content says or otherwise suggests that you work for us, it should include a simple and visible disclaimer such as "these are my personal views and not those of my employer".
- If you discover web content about us posted by others which breaches (or may breach) any of these guidelines, you must bring this to your manager's attention as soon as possible.
- As an employee of the Company you owe a duty of loyalty and discretion. Please remember this when posting personal web content: if you think what you are about to say may be inappropriate – don't say it!
- If you are in any doubt as to the application of these guidelines or have any queries about their meaning or extent, you should speak to your manager as possible.

2. Duty of disclosure

You must talk to your manager and inform them if:

you already have a personal blog or website which indicates in any way that you work for us;

- you want to start blogging, and your blog/website will say that you work for us; and/or
- if someone offers to pay you for blogging, running a website or producing or maintaining web content (as this could constitute a conflict of interest).

3. Monitoring

Although we do not routinely monitor the internet to check employees' personal web content, you should remember that this media has a potentially unrestricted audience and you should not regard such content as private. We may commence monitoring in exceptional circumstances or where there is a suspected breach of this policy.

Evidence of breach of this policy

If a breach of this policy or any other policy or work rule is brought to our attention, we will use all relevant electronic media as evidence and where appropriate to do so, take disciplinary action up to and including dismissal.

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