

## **Staff Social Media Acceptable Use Policy**

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Controlled Document

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## Social Media Acceptable Use Policy

Version 1.0

20<sup>th</sup> July 2023

### Version Control Table

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## **1 Scope, Purpose and Definitions**

- 1.1 This policy is designed to clarify how the RNN Group (hereinafter referred to as the 'Group') uses social media and what it expects from staff.
- 1.2 This policy shall apply to all employees including "designated senior post holders" as defined in the Corporation's Articles of Governance and those newly appointed and in their probationary period. It shall also apply to all RES employees and workers, external agency staff, contractors, volunteers, student teachers and those undertaking work experience. Collectively, these shall hereinafter be referred to as 'Staff'.
- 1.3 Social media enables the Group to build connections and relationships, share information quickly e.g. campus or snow updates, celebrate success, show the human side of the organisation, communicate with a wide range of audiences and stakeholders and respond to queries swiftly.
- 1.4 Social media is, therefore, an integral part of the Group marketing and public relations remit providing valuable channels that are also useful for communicating during an emergency or crisis when information needs to be shared quickly.
- 1.5 Social media is the term commonly given to internet and mobile-based channels and tools that allow users to interact with one another and share opinions and content. As the name implies, social media involves the building of communities or networks that encourage participation and engagement. Social media allows parties to communicate instantly or to share data in a public forum via websites or apps. This includes, but is not limited to, online forums, blogs, video-and image sharing websites and social platforms such as YouTube, Facebook, Twitter, Instagram, SnapChat, SlideShare and LinkedIn as well as messaging apps such as WhatsApp and Facebook Messenger. The nature of social media is that it is rapidly changing and evolving and this policy is intended to cover all communication platforms, which may emerge in the future, but are not currently in existence.

## **2 Policy Aims**

- 2.1 This policy provides guidance to Staff of the Group on how to maximise the benefits of social media and minimise the risks. This policy is designed to help Staff use these platforms responsibly so that they understand the conduct expected by the Group to ensure consistent high standards of social media use. The Group's Marketing Team will support any staff who need advice and guidance on how best to use social media. Email: [marketing@rnnngroup.ac.uk](mailto:marketing@rnnngroup.ac.uk).

## **3. Principles**

- 3.1 The Group is committed to being a trusted and reliable source of information through its use of social media. It aims to take a strategic approach with content reflecting key priorities, has a clear understanding of the etiquette and boundaries of social media, takes both a proactive, reactive and inclusive approach that enhances the reputation of the Group and its subsidiaries and that reflects its values: we deliver, we are inclusive, we have integrity and we are one team.

- 3.2 By being strategic and proactive, the Group will ensure that it posts regular, appropriate and engaging social media content that reflects organisational priorities. By being reactive, the Group aims to ensure that its point of view is accurately portrayed when it needs to respond to a situation or issue in the public interest.
- 3.3 The Group and its subsidiaries will always convey accurate and factual information based on the best available knowledge that it has at the time of any social media query, and respond in a timely and appropriate way when there is online discussion of the college to foster an understanding of the Group's actions, decisions and policies in the event of negative queries.
- 3.4 Content used on any account will always be authentic and an accurate representation of the Group and any educational / training offer.

#### **4. Roles and Responsibilities**

- 4.1 The Executive Director of Human Resources, Organisational Development and Marketing and the Director of Marketing and Learner Recruitment shall be the owners of this policy and responsible for the developing and monitoring of it.

#### **5. Implementation Arrangements**

- 5.1 The roles and responsibilities of Staff in implementing this policy and any procedures arising are set out in the guidelines section.
- 5.2 All new Staff should be made aware of the policy during their induction and training sessions.
- 5.3 Staff shall have access to this policy on the Group's staff portal and the Metacompliance system.

#### **6. Guidelines**

##### ***Authorisation of social media accounts***

- 6.1 The Group's Marketing Team are the lead account holder for all Group official social media accounts. The team manage the official social media accounts and provide guidance to Group departments on best practice to ensure a strategic approach, consistency of style and messaging, appropriate high quality content and tone of voice in line with the Group brand. A social media presence becomes part of an organisation's legacy. Posts, pictures, images, tweets and content in general can stay online for a long time. The Marketing Team are best positioned to think ahead and decide which messages to share via social media channels given their lasting legacies for the Group.
- 6.2 The Marketing Team will recommend the suspension or deactivation of any accounts, which have remained inactive or dormant for an extended period of time. The team can also direct secondary social media accounts in the event of an emergency or crisis, providing content to be posted if there is a need for emergency-related information and updates.

### Account security

- 6.3 Social media accounts are at risk of hacking. This can cause significant reputational damage and potentially serious misinformation for stakeholders. In maintaining the master list of all official Group social media accounts, the Marketing Team keep the login details for continuity and security reasons.
- 6.4 Passwords are stored in a password encrypted file and maintained in a shared folder to which only members of the Marketing Team have access. These are also changed periodically for security purposes. The Marketing Team Leader is responsible for sharing passwords with relevant Marketing colleagues and updating appropriately as people leave the organisation.

### Active Group social media accounts

- 6.5 As at the creation of this Policy, there are 28 official college social media accounts across platforms including Facebook, Instagram, LinkedIn, Twitter, TikTok and YouTube, which aim to provide a

regular flow of engaging content and respond to enquiries. The recognised official accounts are listed below. These are managed directly by the Marketing Team.

	Rotherham College	North Notts College	Dearne Valley College	University Centre Rotherham	RNN Group
<b>Facebook</b>	<a href="#">@RotherhamCollege</a>	<a href="#">@NNCoFE</a>	<a href="#">@DearneValleyCollege</a>	<a href="#">@universitycentrerotherham</a>	<a href="#">@RNNGroupUK</a>
<b>Twitter</b>	<a href="#">@RotherhamColl</a>	<a href="#">@NNC Worksop</a>	<a href="#">DVCollege</a>	<a href="#">@rotherhamuni</a>	<a href="#">@RNNGroup</a>
<b>LinkedIn</b>	<a href="#">Rotherham College</a>	<a href="#">North Notts College</a>	<a href="#">Dearne Valley College</a>	<a href="#">University Centre Rotherham</a>	<a href="#">RNN Group UK</a>
<b>YouTube</b>	<a href="#">rotherhamcollege</a>	<a href="#">North Notts College</a>	<a href="#">Dearne Valley College</a>	<a href="#">University Centre Rotherham</a>	<a href="#">RNN Group</a>
<b>Instagram</b>	<a href="#">rotherhamcoll</a>	<a href="#">northnottscoll</a>	<a href="#">dvcollege</a>	<a href="#">universitycentrerotherham</a>	
<b>TikTok</b>	<a href="#">@rotherhamcoll</a>	<a href="#">@northnottscoll</a>	<a href="#">@dvcollege</a>	<a href="#">@rotherhamuni</a>	

- 6.6 The Group's campus based commercial outlets have social media platforms and are run in conjunction with the Marketing Team.

	Facebook	Instagram	Pinterest
Inspire Hair and Beauty	<a href="https://www.facebook.com/InspireHairandBeauty">https://www.facebook.com/InspireHairandBeauty</a>		<a href="https://www.pinterest.co.uk/Inspirerotherha/">https://www.pinterest.co.uk/Inspirerotherha/</a>
The Wharnccliffe	<a href="https://www.facebook.com/TheWharnccliffe">https://www.facebook.com/TheWharnccliffe</a>		
Aspirations Hair and Beauty Salon	<a href="https://www.facebook.com/aspirationshairandbeauty">https://www.facebook.com/aspirationshairandbeauty</a>	<a href="https://www.instagram.com/inspire_media_hair_beauty/">https://www.instagram.com/inspire_media_hair_beauty/</a>	
DVC Sports	<a href="https://www.facebook.com/InspiringACommunity">https://www.facebook.com/InspiringACommunity</a>	<a href="https://www.instagram.com/dvcports/">https://www.instagram.com/dvcports/</a>	

- 6.7 Accounts that are not listed above are not affiliated to the Group, are not official accounts and may be dormant and / or are in the process of being closed.

- 6.8 The creation of any new social media accounts must be approved by the Director of Marketing and Learner Recruitment on behalf of the Marketing Team and the Group's name or branding should not be used without formal written approval. Email: [marketing@rnngroup.ac.uk](mailto:marketing@rnngroup.ac.uk).
- 6.9 The Group aims to respond to social media queries and complaints as soon as possible – and within 24 hours (subject to weekends and Group closure days) – where appropriate. In the event of negative posts, the Marketing Team will cross reference to other departments, such as the complaints process, before determining the most appropriate response to ensure a considered, consistent and informed response.
- 6.10 On occasions, the Group may need to block or report an individual if their behaviour breaches the Group social media disclaimer. The Marketing Team will not automatically delete negative comments on social media channels, recognising that to do so is contrary to the spirit of these platforms and could cause reputational damage to the Group.
- 6.11 There are two exceptions to the provisions in 6.10 above:
- a) If a post contravenes the Group's disclaimer or the terms and conditions of the social platforms themselves, for example, removing a racial hatred comment on a Facebook page. In some cases, it is possible to contact the platform to request material is removed where it contravenes their own guidelines – for example, Facebook and Google reviews, which are beyond the control of the Group.
  - b) 'Trolling' - if negative comments are posted on adverts and the Group is being 'trolled' on or in relation to content that it is paying to boost, such comments will be deleted.

### ***Social media content***

- 6.12 All posts from corporate social media accounts represent the Group. It is vital that all posts are carefully considered, appropriate and do not damage the reputation of the Group or bring it into disrepute.
- 6.13 The Marketing Team is responsible for creating social media content for the Group official accounts and can provide guidance to secondary account holders. Any secondary accounts have agreed users and log ins/access should not be shared more widely than any agreement in place from time to time.
- 6.14 Staff must not use their personal accounts or create unauthorised accounts to communicate with students or applicants. Use of personal or unauthorised accounts which purport to be Group accounts in this context will be reported to the Human Resources Team and may lead to disciplinary action.
- 6.15 All enquiries should be directed to and made through the Group's official social media accounts managed by the Marketing Team.



- 6.16 Safeguards should be put in place to minimise the risk of communication errors via social media, including checking content with a colleague prior to publication.
- 6.17 Posts must be in line with the values of the Group and any relevant policies.
- 6.18 Content posted or promoted on corporate accounts must be respectful of others and courteous.
- 6.19 Corporate accounts must not be used to criticise or argue with colleagues, students, competitors or any other individual or organisation.
- 6.20 Content must be accurate and should not commit to something that the Group does not intend to deliver. If a mistake is made, the Group will be transparent and update the page with a correction.
- 6.21 Staff are expected not to be involved in any social media activity or comment which is malicious or deliberately damaging to the Group or any individual associated with the Group. Those staff using official social media accounts must not post content that:
- Harasses, bullies or intimidates or incites others to do so.
  - Is intended to incite violence or hatred.
  - Is abusive about an individual's age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion or belief, sex or sexual orientation.
  - Includes confidential information about an individual or organisation.
  - Discusses the Group's internal workings.
  - Discusses future plans not yet communicated to the public
  - Uses someone else's images or written content without their permission and/or without acknowledgement.
  - Content that is politically sensitive, unless the Group has published an official position on this.
  - Content that is commercially sensitive.

***Third party behaviour and social media disclaimer.***

- 6.22 The Group will not tolerate inappropriate behaviour by others on its social media channels. This includes students and third parties. The Group reserves the right to delete posts or block individuals, where their behaviour breaches this policy, and to raise an issue internally with appropriate managers so that it can be addressed offline. The Group will post a disclaimer on its social media channels as follows, clarifying its position and rationale in the event such action is needed:

*The RNN Group social media sites are places where we encourage interaction and discussion between students, staff, alumni and in anyone interested in the college. If you post a question to this site, we will respond as promptly as possible during working hours (Mon-Thurs, 8:30am-5:00pm & Fri 8:30am-4:30pm). If your enquiry falls outside of these hours, we will get back to you as soon as possible when office hours resume. We ask that you're respectful in your comments. We reserve the right to remove any content that is: abusive or personal attacks; unlawful, obscene, defamatory, threatening, harassing, abusive, slanderous, hateful or embarrassing to any other entity; third party advertising; chain letters or 'spam'. We also reserve the right to terminate*

*involvement by users who post such content. The views and opinions expressed on our social media sites do not necessarily represent those of the college. Therefore, we cannot be held responsible for the accuracy or reliability of information posted by external parties. For your safety, please do not include your phone number, email, address or other personal information in a post, as your comments are visible to all.*

### **Third party social media sites**

- 6.23 On occasions, the Group is discussed in the public domain via online channels that it does not manage. In those instances, the Group will decide whether it is appropriate to:
- a) Ignore those discussions.
  - b) Join the conversation to draw audiences back to the Group's official channels.
  - c) Intervene to clarify or explain the Group's position.
  - d) Alternatively, the response may combine points b and c as above.

### **Social media in an emergency**

- 6.24 Social media can be a very effective tool in a crisis alongside other communication channels. At the same time, crises can also start and escalate on social media. Social media is a listening tool first and foremost. In the event of a difficult issue, the Group will review and aim to understand the situation, to avoid instantly overreacting and potentially escalating the situation. The Executive Director of Human Resources, Organisational Development and Marketing and the Director of Marketing and Learner Recruitment, must be notified immediately of any crisis or emergency, or any situation which could reasonably be believed to potentially become a crisis or emergency.
- 6.25 A crisis is defined as any emergency or controversy that could negatively affect the public perception or reputation of the Group. Emergencies include fires, accidents, explosion, weather-related incidents and natural disasters. Please note this list is not exhaustive. Staff who become aware of potential issues that could generate adverse social media enquiries for the college, should seek immediate advice from the Director of Marketing and Learner Recruitment so the facts can be gathered quickly, the Group's position investigated and an appropriate response developed.
- 6.26 The Marketing Team is the authorised source for confirming the Group's position on all communication platforms including the website, social media and the media on all major announcements such as, for example, campus closures due to adverse weather. This process helps consistency of messaging in communications to students and Staff.
- 6.27 The Marketing Team will aim to react in a timely manner if it becomes apparent that the issue is developing into a crisis and keep concerned parties up to date with the relevant information, ensuring that this is joined up with internal and external messages to staff and external stakeholders.
- 6.28 The Marketing Team will identify the source of the issue, aim to understand where the crisis has originated, verify the facts and monitor channels in order to make informed decisions about how to

respond. The Group, in its social media communications, is committed to being honest and clear, and making sure all messaging is verifiable, as the news media will check it. The Group is also committed to ensuring that its social media audiences are aware of any action that is being taken to resolve a situation. The Marketing Team will also consider whether it needs to postpone or cancel any pre-scheduled posts.

### ***News media enquiries via social media***

6.29 Journalists will sometimes use social media, for example Twitter and LinkedIn, to request interviews. Staff should not respond to any queries via social media but instead re-route the details of any such request to the Director of Marketing and Learner Recruitment who will liaise with members of the Executive Leadership Team as appropriate prior to issuing any response.

### ***Legal considerations***

6.30 A range of legislation is relevant to social media use. Staff should be mindful of the following legal considerations including ensuring that posts do not breach confidentiality and copyright or make defamatory comments. Please note the following list is not exhaustive.

a) *Defamation*

A defamatory statement is one that causes, or is likely to cause, serious harm to a person or organisation by damaging their reputation. If the defamatory statement is written down it is known as libel. If it is spoken, it is slander. There are several defences against legal action, under the Defamation Act 2013, which include truth, honest opinion, public interest, privilege and operation of websites. For more information:

<https://www.legislation.gov.uk/ukpga/2013/26/enacted>

b) *Malicious falsehood*

Malicious falsehood refers to untrue and damaging content, which although not defamatory, still causes damage, such as financial loss for the subject. Malice is defined as knowingly making a false statement. For example, making a false statement about your competitors in a comparative advertisement.

c) *Malicious communications*

The Malicious Communications Act 1988 covers the sending of any direct electronic communication to someone, where the sender's intent was to cause distress or anxiety, and the content is indecent or grossly offensive, a threat or untrue information known to be false by the sender. For more information:

<https://www.legislation.gov.uk/ukpga/1988/27/contents>

d) The Communications Act 2003 covers the sending of any public electronic communication message or content that is grossly offensive or indecent, obscene or menacing, and causing any such message or content to be sent. For example, this can include the sharing of such information by posting, re-posting or re-tweeting it.

e) General Data Protection Regulation Organisations must set out in their privacy notices how they will use personal data in accordance with the requirements of the GDPR 2018. With social media being a direct form of communication, it is important that the Group keeps social media platforms secure and handles personal data appropriately. On social media, the moderator may suggest to a

user that it is better to direct message if they wish to share their personal data rather than public message. If the user persists in sharing personal data via public messaging then in addition to the privacy notice; the moderator should use boilerplate clauses for public messages where personal data is disclosed, for example:

*Thank you for your message. We care about your security and will not use any of your personal details obtained in this communication for marketing purposes. If you provide us with any contact information, it will only be used to manage your enquiry and not for any other reason. Any personal data shared in public by the user on social platforms is shared at their own risk.*

- f) Some social media campaigns may involve data collection. For example, when running a competition on a social media platform and collecting personal data for this purpose, competition entry terms and conditions must explain how the collected data will be used.
- g) *Advertising Standards Authority (ASA)*  
The Advertising Standards Authority is the UK's independent regulator for the advertising industry. The ASA applies the codes written by the Committee for Advertising Practice (CAP). The codes of practice cover marketing communications on websites, social media channels. To meet with these principles, all advertising content must be 'legal, decent and honest'; all claims must be qualified, and statistical data must be referenced. For more information: <https://www.asa.org.uk/>
- h) *Intellectual property*  
Intellectual property covers work created using the mind such as the names of brands and products, inventions, designs and the content that are written, made or produced. Intellectual property can be protected through copyright law, trademarks and patents. More information can be found here: <https://www.gov.uk/intellectual-property-an-overview>
- i) *Copyright*  
Copyright covers material including photographs, literature, music, film, audio and art. Copyright is automatic and does not need to be registered – unlike trademarks, for example. The copyright owner has certain economic and moral rights – for example, the right to be credited as the creator of the material and the right to be financially rewarded if another party uses the material. In most cases, the copyright owner needs to give permission for the material to be used. For more information: <https://www.gov.uk/topic/intellectual-property/copyright>
- j) *Trademarks*  
Trademarks include logos, slogans and words, and are signs used to distinguish products or services of one company from another. A trademark owner has the right to prevent unauthorised use of that trademark. For more information: <https://www.gov.uk/topic/intellectual-property/trade-marks>

## **7. Information for Staff on Social Media**

### **7.1 Guidance for Staff using Group social media accounts.**

- a) Staff using official Group media accounts to engage in Group business should only comment within their area of expertise to provide individual perspectives on non-confidential activities within the group.
- b) Staff must never represent themselves or the Group in a false or misleading way.
- c) Staff must not publish or report conversations that are private or internal to the Group considering privacy, confidentiality and legal guidelines.
- d) Any breach of a), b) or c) above will be reported to the Human Resources Team and may result in disciplinary action being taken.

#### *7.2 Guidance for staff with regard to personal and professional social media accounts / platforms*

- a) Social media can be an important tool for Staff to raise their profile and build networks. It is recommended that Staff separate their personal and professional presence on social media.
- b) Personal and professional accounts must not use Group branding or purport to represent the views or opinions of the Group as a whole. If Staff do discuss or refer to their work on social media, they must make it clear on their profile that the views expressed are their own and do not necessarily reflect those of the Group.
- c) The Group recognises that Staff may wish to use their own communication devices such as mobile phones or tablets to access social media during their working day. Whilst this practice is discouraged during working hours, the Group requests that such access is limited to during formal breaks and if a member of staff is deemed to be using social media on personal devices excessively then this may be referred to the Human Resources team and may form part of a wider investigation and be used to inform disciplinary procedures.
- d) Staff are advised to consider what they are posting on their individual accounts – as per the guidance provided in this policy.
- e) The Group does not monitor Staff accounts. However, if a concern is raised regarding content posted on a staff member's personal or professional social media account and the post is considered to be misconduct, the Group has the right to request the removal of content. In addition, the matter may be addressed through disciplinary procedures.
- f) Staff must not use their personal and professional social media accounts to promote the work of the Group, but should only repost official posts and information from Group platforms.
- g) On some social media channels e.g. Facebook, Linked In, there is the option to add an individual's job title and the company worked for. Staff should consider the impact of any content posted or potentially posted on the Group's reputation if this information were to be posted.
- h) If a staff member posts something on a personal and / or professional social media account that is generally offensive or may damage the reputation of

the Group then the Group retains the right to take formal disciplinary action as may be deemed necessary and determined on a case by case basis.

- i) Staff must not use personal accounts or create unauthorised accounts to communicate with students or applicants under any circumstances. All enquiries should come through the Group's official social media accounts managed by the Marketing Team.
- j) The Group reserves the right to monitor use of social media platforms and take appropriate action to protect against any misuse that may be harmful, in accordance with the law and IT regulations.
- k) Staff should consider that the Group's appearance on social media is reputationally sensitive. If staff's use of social media is considered to bring the organisation into disrepute by, for example, being derogatory, discriminatory, bullying, threatening, defamatory, offensive, then the Group may consider action or seek legal recourse. Which may include asking for posts, such as comments, videos or photographs posted about the Group and / or work colleagues, to be removed, as well as activating disciplinary procedures.
- l) Staff must not post images of any learner or prospective learner on their personal or professional social media platforms (unless this learner or prospective learner is a member of their immediate family or in their care). Staff should instead repost only the official posts from the official social media accounts of the Group. Any breach of this clause shall be considered on its own merits and on a case by case basis but may result in recourse to the disciplinary procedure.
- m) Staff must not use Group devices to access personal social media accounts for any purposes or at any time and, unless with specific authorisation, must not install social media or, private or group messaging apps (for example Whatsapp, Snapchat or Facebook Messenger) onto any Group device.
- n) Staff are reminded that they have an overall responsibility for confidentiality, trust and acceptable behaviour towards the Group as a whole as well as to individual colleagues and that this applies to electronic forms of communication in the same way as any other form of social interaction. Any comment made via social media platforms which are regarded as being inappropriate, may constitute forms of discrimination, bullying and/or harassment will be raised with the Human Resources team. Comments which are considered as being defamatory (libellous or slanderous) shall be prohibited. Where allegations are raised and upheld on investigation, disciplinary action will be considered and this may include dismissal in cases of allegations of a serious nature.
- o) Staff must not use social media (including private or group messaging) as a forum to air their grievances about their employment, colleagues or the Group. If staff feel that they have such issues then these should be addressed in accordance with the Grievance Procedure or other appropriate forms of internal Policy or Procedure.
- p) Information owned by the Group must not be discussed or referred to on personal social media (except reposting of materials posted through official

Group social media channels), even within private messages. Staff are reminded that information shared within private messages, private chat and

group chat can be subject to 'screen grabbing' by the parties to the discussion and as such can be shared and should therefore these should not be considered as being a 'safe' form of communication. Evidence of any comments made or information shared in these ways may form part of an investigation which may lead to disciplinary action.

## **8. Information on the use of Social Media by third parties**

- 8.1 Staff must ensure that any third-party guest speakers or event facilitators who are booked or arranged by either an individual staff member or a departmental group are made aware that they must not publish any post or image on their own social media feeds which have not been approved, and ideally written, by the Group's own Marketing Department. Failure to adhere to this provision may result in any future bookings and events involving these third-parties being cancelled and the Group reserves the right to obtain legal advice and take appropriate action as necessary.
- 8.2 Staff must make the Marketing Department aware of any third-party guest speakers or event facilitators during the event organisation phase in order that the Marketing Department can arrange attendance in an official capacity or discuss alternative arrangements.
- 8.3 The marketing Department will be responsible for writing and distributing any materials to be used on such third-party social media feeds.