

| Social Media policy | | Reviewed | October 2024 |
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| | | Revised | |
| Adopted | October 2020 | Next review | October 2024 |

Social Media policy

1. Introduction

Kingston GP Chambers (KGPC) has introduced this policy in order to help staff make appropriate decisions about the use of social media such as blogs, social networking websites, podcasts, forums, message boards, or comments on web-articles, such as Twitter, Facebook, LinkedIn etc.

2. Purpose

This policy outlines the standards KGPC requires staff to observe when using social media, the circumstances in which KGPC will monitor use of social media and the action KGPC will take in respect of breaches of this policy.

This policy supplements the IT and Data Security Policy - this policy may be amended at any time.

3. General Principles

This policy covers all staff including Directors, Contractors etc. All staff are expected to comply with this policy at all times to protect the privacy, confidentiality, and interests of KGPC's business, services, employees, and clients.

Breach of this policy will be dealt with under the Disciplinary Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

The CQC compliance specialist has overall responsibility for the effective operation of this policy and will be responsible for monitoring and reviewing the operation of this policy

All staff are responsible for their own compliance with this policy and for ensuring that it is consistently applied. All staff should ensure that they take the time to read and understand it. Any breach of this policy should be reported to the CQC compliance specialist.

Questions regarding the content or application of this policy should be directed to the CQC compliance specialist.

4. Using social media sites on behalf of the Company

Only members of staff with explicit permission from the CQC compliance specialist are permitted to post material on a social media website in our name and on KGPC's behalf. Any breach of this restriction will amount to gross misconduct.



All communications KGPC makes using social media which promote KGPC's services can only be made by members of staff with explicit permission from the CQC compliance specialist.

Otherwise, staff must not make any communication using social media which promotes or discusses KGPC's services.

5. Using work-related social media

KGPC recognises the importance of the internet in shaping public thinking about its business and services. KGPC also recognise the importance of staff joining in and helping shape conversation and direction through interaction in social media.

Staff are therefore permitted to interact on approved social media websites. Before using work-related social media staff must:

- have read and understood this policy and the IT and Data Security Policy:
- have sought and gained prior approval to do so from a Director or the CQC compliance specialist.

6. Personal use of social media sites

KGPC permits the use of social media websites for personal use subject to certain conditions set out below. However, KGPC reserves the right to withdraw permission at any time at the discretion of the CQC compliance specialist or a Director.

The following conditions must be met for personal use to continue:

- use must be minimal and take place substantially out of normal working hours
- use must not breach any of the rules set out in this policy;
- use must not interfere with business commitments:
- use must comply with KGPC's policies, including the Equal Opportunities Policy, Bullying &-Harassment Policy, Data Protection Act and Disciplinary Procedure.

7. Rules for use of social media

Whenever staff are permitted to use social media in accordance with this policy, they must adhere to the following general rules:

- Always write in the first person, identify who you are and what your role is, and use the following disclaimer "The views expressed are my own and don't reflect the views of my employer".
- Do not upload, post, forward or post a link to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content.



- Any member of staff who feels that they have been harassed or bullied, or are offended by material posted or uploaded by a colleague onto a social media website should inform the CQC compliance specialist.
- Never disclose commercially sensitive, anti-competitive, private or confidential information. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss this with the CQC compliance specialist.
- Do not upload, post or forward any content belonging to a third party unless you have that third party's consent.
- It is acceptable to quote a small excerpt from an article, particularly for the purposes of commenting on it. Quote accurately, include references and when in doubt, link, don't copy.
- Before you include a link to a third party website, check that any terms and conditions of that website permit you to link to it. All links must be done so that it is clear to the user that they have moved to the third party's website.
- When making use of any social media platform, you must read and comply with its terms of use.
- Do not post, upload or forward a link to chain mail, junk mail, cartoons, jokes or gossip.
- Be honest and open, but be mindful of the impact your contribution might make to people's perceptions of us as a business. If you make a mistake in a contribution, be prompt in admitting and correcting it.
- You are personally responsible for content you publish into social media tools – be aware that what you publish will be public for many years.
- Don't escalate heated discussions, try to be conciliatory, respectful and quote facts to lower the temperature and correct misrepresentations.
 Never contribute to a discussion if you are angry or upset, return to it later when you can contribute in a calm and rational manner.
- If you feel even slightly uneasy about something you are about to publish, then you shouldn't do it. If in doubt, always discuss it with the CQC compliance specialist.
- Don't discuss colleagues, staff, customers or suppliers without their prior approval.
- Always consider others' privacy and avoid discussing topics that may be inflammatory e.g. politics and religion.
- Avoid publishing your contact details where they can be accessed and used widely by people you did not intend to see them, and never publish anyone else's contact details.
- Before your first contribution on any social media site, observe the
 activity on the site for a while before launching in yourself to get a feel
 for the style of contributions, the nature of the content and any
 'unwritten' rules that other contributors might follow.
- Activity on social media websites during office hours should complement and/or support your role and should be used in moderation.
- If you notice any content posted on social media about us (whether complementary or critical) please report it to a Director



8. Monitoring use of social media websites

Staff should be aware that any use of social media websites (whether or not accessed for work purposes) may be monitored and, where breaches of this policy are found, action may be taken under the Disciplinary Procedure.

KGPC reserves the right to restrict or prevent access to certain social media websites if it considers personal use to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

Misuse of social media websites can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal liability against you and us. It may also cause embarrassment to the business.

In particular uploading, posting forwarding or posting a link to any of the following types of material on a social media website, whether in a professional or personal capacity, will amount to gross misconduct (this list is not exhaustive):

- pornographic material (that is, writing, pictures, films and video clips of a sexually explicit or arousing nature);
- a false and defamatory statement about any person or organisation;
- material which is offensive, obscene, criminal discriminatory, derogatory or may cause embarrassment to us, our customers or our staff;
- confidential information about us or any of our staff or customers (which you do not have express authority to disseminate);
- any other statement which is likely to create any liability (whether criminal or civil, and whether for you or us); or
- material in breach of copyright or other intellectual property rights, or which invades the privacy of any person. Any such action will be addressed under the Disciplinary Procedure and is likely to result in summary dismissal.

Where evidence of misuse is found KGPC may undertake a more detailed investigation in accordance with the Disciplinary Procedure. If necessary such information may be handed to the police in connection with a criminal investigation.

If staff notice any use of social media by other members of staff in breach of this policy, it should be reported to the CQC compliance specialist.