

<b>Title of Document</b>	<b>Social Media Policy</b>
<b>Name of Department</b>	<b>Marketing</b>

<b>What type of document is this?</b>	<b>Policy</b>	This sets out instructions for how a particular procedure in Helping Hands is to be routinely carried out.	
<b>Which Helping Hands policy/SOP does this document relate to?</b>	N/A	<b>Index number of policy/SOP</b>	N/A

<b>Which Operational Priority/Priorities does this document link to?</b>	Internal & External Communications	Information Management & Technology	People, Performance & Culture	

<b>Custodian of document</b>	Chief Customer Officer	<b>Committee responsible for this document</b>	Policy Committee
<b>Approval date and committee chairperson signature</b>	04.12.2024	<b>When is its next scheduled review?</b>	04.12.2025

<b>Who does it apply to?</b>	All Helping Hands employees					
	<b>Does it apply to bank workers?</b>	Yes	<b>Does it apply to agency staff?</b>	Yes	<b>Does it apply to third party contractors?</b>	Yes

<b>Purpose of the Policy</b>	<p>Social media is defined as Facebook, Instagram, X (formally Twitter), You Tube, TikTok, WhatsApp, Vimeo, LinkedIn and all other social networking sites, internet postings and blogs.</p> <p>This policy is to ensure the acceptable use and code of conduct across all Helping Hands social media platforms and to minimise the risks to our business. It applies to use of social media for business purposes as well as personal use that may affect our business in any way. This applies when posting to personal sites, Helping Hands sites (including the official website) or commenting on other sites.</p>
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### Key Social Media Policy Requirements

- To outline to employees what is acceptable use of social media linked to their employment.
- To make a clear distinction between use of social media for business and personal use
- To encourage employees to be mindful of the content they share
- To ensure appropriate standards of confidentiality and professional expectations are met.
- To ensure that professional boundaries with customers are maintained and protected.
- To remember that posting on a social media site is private as these sites are known to make changes to users' privacy settings without warning or notification and may also make connections between two sites by a photograph or some unique personal data such as Facebook and LinkedIn.
- This policy does not form part of any employee's contract of employment and may be amended at any time and any changes will be communicated to staff prior to becoming effective.

### ROLES AND RESPONSIBILITIES

Role	Responsibility
Marketing	Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks lies with Marketing, with the assistance of IT, who will review this policy periodically to ensure that it meets legal requirements, draws upon best practice, and reflects developments in social media use and technology.
Managers	Managers have the specific responsibility for operating within the boundaries of this policy, ensuring that all employees understand the standards of conduct expected and taking action when standards fall below its requirements.
Employees	All employees are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to the Head of the IT Department. Queries regarding the content or application of this SOP should be directed to the Head of the IT Department. This policy does not form part of any employee's contract of employment and can be amended at any time.

#### 1.0 Social Media for Business Use

- 1.1 An employee is seen as representing Helping Hands if they post or comment on any of the business sites and accounts or when using a work profile or email address.
- 1.2 Employees are permitted to access Helping Hands social media platforms for work purposes during normal working hours. This use should not be excessive or interfere with other duties or give rise to personal use of social media during work time.
- 1.3 If you identify an affiliation to Helping Hands, ensure you disclose this connection and your role at Helping Hands where appropriate.
- 1.4 Any social media online activity should be consistent with Helping Hands high standards of professional conduct. This includes but is not limited to:



- Post honest and accurate information.
- Obtain written consent before posting information or pictures of customers, partners, suppliers, or employees.
- Pictures of customers, partners, suppliers, or employees may only be taken with permission and only for work purposes, to then upload onto social media platforms. These images or videos must be deleted from work or personal devices as soon as is convenient.
- Be respectful and professional when making statements about fellow employees, suppliers business partners, competitors and customers.
- Avoid remarks that unwittingly cause offence, are disparaging or constitute unlawful discrimination.
- Avoid use of offensive or intimidating language
- Keep your audience in mind when publishing any content; is it relevant and appropriate to the business.

More details on appropriate posts and how to respond to social media comments and messages is available through social media guides provided by the marketing team.

- 1.5 Do not post content that may be considered personal such as posting links to or information about non-related issues or events.
- 1.6 Helping Hands does not endorse people, products, services and organisations that have not been authorised by the appropriate line manager or departmental head. This includes unsubstantiated sources relating to medical claims, information or advice.
- 1.7 Employees must declare any commercial or conflicts of interest if publishing content in an official capacity to members of the public. These interests may be financial or employment with other organisations.
- 1.8 You are personally responsible for all communications that you publish on the internet for anyone to see.
- 1.9 If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with your manager.
- 1.10 If you see social media content that disparages or reflects poorly on Helping Hands, you should contact your line manager.
- 1.11 Any misuse of social media should be reported to your line manager.
- 1.12 Employees using AI tools to generate social media content must:
  - Clearly disclose AI involvement by labelling posts (e.g., “This post was created using AI tools”).
  - Verify the accuracy of AI-generated information, especially for sensitive topics like healthcare, caregiving, or customer interactions.
  - Ensure all AI-generated content aligns with Helping Hands' professional standards, brand tone, and values.



- Obtain written approval from the Marketing Manager for any AI-generated material before publication.

1.13 Employees are prohibited from using AI to generate fake endorsements, customer reviews, or any other content that may mislead the audience or violate ethical guidelines.

1.14 AI tools should only be used from the approved company list. If an employee wishes to use a new tool, it must first be vetted and approved by the Marketing Department and IT.

## 2.0 Personal use of social media

2.1 Personal use of social media is never permitted during working hours or by means of our computers, networks and other IT resources and communications systems.

2.2 You must not disclose an affiliation to Helping Hands on your personal profile, in any social media posting or express opinions on our behalf unless you are authorised to do so. In these circumstances, you must ensure your personal profile and any content posted is consistent with the professional image befitting of the business.

2.3 You must make it clear in social media postings, or in your personal profile, that you are speaking on your own behalf. Write in the first person and use a personal profile or email address.

2.4 When using social media in a personal capacity, consider the use of a disclaimer such as ***“The views expressed on this [blog/website] are my own and do not reflect the views of my employer.”*** This type of language can also be added to a personal or ‘About me’ section of a blog or social media profile.

2.5 For personal media accounts, avoid any implication that an endorsement is on behalf of Helping Hands. As an example, LinkedIn users may endorse individuals or companies, but do not use Helping Hands name or imply or specify any connection between that endorsement and Helping Hands.

2.6 Unless approved, you must not include any Helping Hands logos or other trademarks in any social media posting or in your profile, social media name, handle or URL.

2.7 While using social media in a personal capacity, always consider how your actions may affect the reputation of Helping Hands. Any breach of this policy and subsequent damage to the business reputation may result in disciplinary action.

2.8 For social media sites or applications which are solely work or professionally based, such as LinkedIn or professional networking forums, employees are permitted to state that you work at Helping Hands, and the capacity of your employment.



### 3.0 Prohibited Use

- 3.1 Confidentiality must be upheld. No personal information about a customer, employee, or third party should be disclosed through any media, including AI tools, without explicit consent and a completed GDPR consent form.
- 3.2 Do not accept 'friend requests' from customers on either personal or business social media platforms unless in the former case, where a relationship or friendship predates the professional relationship.
- 3.3 Any communication that can be classed as bullying or cyberbullying is not permitted. This includes negative comments on pictures, abusive posts, posting embarrassing pictures or videos, etc.
- 3.4 Employees should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to Helping Hands and create legal liability for both the author of the reference and the organisation.
- 3.4 Do not post any social media communications that could damage our business interests or reputation, even indirectly such as 'sharing' or 'retweeting' on other people's social media.
- 3.5 You must not use social media to defame or disparage Helping Hands, our employees or any third party; to harass, bully or unlawfully discriminate against employees or third parties; to make false or misleading statements; or to impersonate colleagues or third parties.
- 3.6 You must not post comments about sensitive business-related topics, such as our performance, or do anything to jeopardise our trade secrets, confidential information and intellectual property. You must not include our logos or other trademarks in any social media posting or in your profile on any social media.
- 3.7 You are not permitted to add business contacts made during your employment to your personal social networking accounts or take this information from Helping Hands networking accounts at the end of your employment.
- 3.8 You must remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may result in disciplinary action.
- 3.9 Employees must not:
  - Use AI tools to create or share content that could harm Helping Hands' reputation, even indirectly.
  - Automate engagement, such as comments, replies, or endorsements, without the express approval of the Marketing Manager.
  - Use AI tools to impersonate colleagues, customers, or third parties, or create deceptive content.

3.10 Employees are responsible for reviewing and removing any AI-generated content flagged as inappropriate, inaccurate, or non-compliant with this policy. Failure to comply may result in disciplinary action.

**TRAINING**

<b>Is training required?</b>	Yes
<b>Details of training</b>	<p>Guidance and training will be supported by the Learning Management System and Line Managers</p> <p>Training on AI tools will be included in the Learning Management System and line manager guidance. This will include:</p> <ul style="list-style-type: none"> <li>• Ethical use of AI for content creation and moderation.</li> <li>• Verification processes for AI-generated content.</li> <li>• Understanding risks associated with AI, such as bias or inaccuracies.</li> </ul>

**COMPLIANCE**

<b>How is compliance with the Policy going to be monitored</b>	<p>Social media should never be used in a way that breaches any other Helping Hands procedures relating to:</p> <ul style="list-style-type: none"> <li>• our IT and communications systems</li> <li>• our obligations to relevant regulatory bodies (e.g., CQC, ICO)</li> <li>• any obligations contained in our procedures relating to confidentiality.</li> <li>• our Disciplinary Policy</li> <li>• any harassment, bullying (including cyberbullying) of employees.</li> <li>• any Equality and Diversity Policy</li> <li>• our Information Governance Policy / SOP</li> <li>• any other laws or regulatory requirements</li> </ul> <p><u>Monitoring</u></p> <p>We reserve the right to monitor, intercept and review, without further notice, employee activities using our IT resources and communications systems, including but not limited to social media postings and activities, for legitimate business purposes which include ascertaining and demonstrating that expected standards are being met by those using the systems and for the detection and investigation of unauthorised use of the systems (including where this is necessary to prevent or detect crime)</p> <p>Should the Helping Hands team come across a derogatory social media post that refers to a Helping Hands employee by name, they will inform the employee’s line manager. The norm would be to discuss the post with the affected employee; however, this will be considered on a case-by-case basis. The post will be reported to the social media platform. The employee’s line manager will deal with the complaint, and it may also be necessary to</p>
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	<p>provide a copy of the post to IT Security, who will assess if the nature of the content justifies informing the police or other relevant authorities.</p> <ul style="list-style-type: none"> <li>• The Marketing Department and IT will periodically review AI-generated content for quality and compliance with company standards.</li> <li>• Helping Hands reserves the right to audit AI tools and usage to ensure adherence to ethical guidelines and applicable laws.</li> </ul> <p>Any misuse of social media should be reported to the relevant member of staff's line manager and in turn to the Head of HR. Questions regarding the content or application of this policy should be directed to Human Resources.</p> <p>Breach of this policy may result in disciplinary action up to and including dismissal. Any employee suspected of committing a breach of this policy will be required to co-operate with our investigation.</p>
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## EQUALITY IMPACT ASSESSMENT AND PROCEDURAL INFORMATION

	Positive / Negative / N/A	Comments
Does the document have a positive or negative impact on one group of people over another on the basis of their:		
• age?	Positive	
• disability?	Positive	
• gender reassignment?	Positive	
• pregnancy and maternity (which includes breastfeeding)?	NA	
• marriage and civil partnerships	NA	
• race (including nationality, ethnic or national origins or colour)?	Positive	
• religion or belief?	Positive	
• sex?	NA	
• sexual orientation?	NA	
If you have identified any potential impact (including any positive impact which may result in more favourable treatment for one particular group of people over another), are any exceptions valid, legal and/or justifiable?	Yes	To ensure that all groups are positively impacted with guidance from this policy on how to manage social media
If the impact on one of the above groups is likely to be negative:		
• Can the impact be avoided?	NA	
• What alternatives are there to achieving the document's aim without the impact?	NA	
• Can the impact be reduced by taking different action?	NA	
• Is there an impact on staff, client or someone else's privacy?	NA	

What was the previous version number of this document?	Version 02
Changes since previous version	At point of policy review updated the following: Added 1.12, 1.13 and 1.14 related to AI generated content



	Added 3.1 related to confidentiality Added 3.9 related to AI ethics Updated training section related to training on AI tools Updated compliance section related to AI monitoring Updated associated documents section	
Who was involved in developing/reviewing /amending the Policy	GDPR Coordinator Marketing Team Senior Marketing Manager Head of Digital	
How confidential is this document?	Restricted	Can be shared freely within Helping Hands but NOT outside.

References	Social Media Guidance Sheet held within the Access system	
Associated Documents	HHH-SOP-001 Information Governance Standard Operating Procedure Communication and Confidentiality Working Instruction GDPR consent form Professional Boundaries Policy Disciplinary Policy Whistleblowing Policy  <b>1. Approved AI Tools</b> <ul style="list-style-type: none"> <li>Employees may only use pre-approved AI tools for tasks such as content creation, comment moderation, and analytics.</li> </ul> <b>2. Disclosure Requirements</b> <ul style="list-style-type: none"> <li>AI-generated content must include a disclosure label (e.g., "This post was created with the assistance of AI").</li> </ul> <b>3. Escalation Protocol</b> <ul style="list-style-type: none"> <li>If an AI tool is unable to resolve an issue or inquiry, employees must escalate the matter to a human representative within the Marketing or Customer Service team.</li> </ul> <b>4. AI for Social Media Monitoring</b> <ul style="list-style-type: none"> <li>AI may be used for monitoring social media platforms to detect harmful or inappropriate content. Such tools must comply with GDPR and other data privacy regulations.</li> </ul> <b>5. AI-Driven Personalization</b> <ul style="list-style-type: none"> <li>Hyper-personalized content generated by AI must adhere to Helping Hands' ethical standards and not misuse customer data.</li> </ul>	

