



IMS Ref.	BPOL-19		
IMS Issue.	04		
IMS Date.	17/02/17		
Page.	1	OF	6

1. Policy Statement

- 1.1 Social media is a term used to describe a suite of applications or tools on the Internet and is sometimes referred to as Web 2.0. Social media is unique because it supports collaboration and the sharing of ideas and opinions across a global scale and the content is usually managed by the users rather than the provider of the applications.
- 1.2 Businesses are finding ways to use social media to help them achieve their objectives through engaging their employees in new and innovative ways, building new relationships with clients, customer and suppliers and managing their brand and reputation on line.
- 1.3 The board of directors at BCM Construction Limited (the board) recognise that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media, such as Facebook, Twitter, LinkedIn, blogs and wikis.
- 1.4 The widespread availability of social media means it is important to understand how to use it effectively and sensibly in the workplace to ensure that the Company is not exposed to legal and governance risks and that its reputation is not adversely affected.
- 1.5 The board believes that when taking part in social media you should be honest, straightforward and respectful. The lines between public and private can become blurred so assume that everything you write is permanent and can be viewed by anyone at any time. Also, assume that everything can be traced back to you personally as well as to your colleagues, the Company and its customers, partners and suppliers.

2. Scope

- 2.1 This aim of this policy is to minimize the risks of social media use, to avoid loss of productivity and to ensure our IT resources and communications systems are used only for appropriate business purposes.
- 2.2 The policy applies to the use of social media for both business and personal purposes, whether during office hours or otherwise. It applies regardless of whether the social media is accessed using our IT facilities and equipment or equipment belonging to members of staff.
- 2.3 Social media activities can include, but are not limited to:
 - Maintaining a profile page on social/business networking site such as Facebook, Twitter or LinkedIn;
 - Writing or commenting on a blog, whether it is your own or the blog of another person;
 - Taking part in discussions on web forums or message boards;
 - Leaving product or service reviews on business websites or customer review websites; and
 - Taking part in online polls.
- 2.4 This policy applies to all workers and employees of the Company, from senior managers to temporary workers, and to all users of social media (collectively referred to as 'staff' in this policy).
- 2.5 Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy.
- 2.6 This policy does not form part of your contract of employment and may be amended from time to time.

3. Responsibilities

- 3.1 The board has overall responsibility for the effective operation of this policy.
- 3.2 HR has day-to-day operational responsibility for this policy, including its regular review.

Document Control Ref:		Document Revision:	
Instruction:		Q:	



IMS Ref.	BPOL-19		
IMS Issue.	04		
IMS Date.	17/02/17		
Page.	2	OF	6

3.3 All managers have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements.

3.4 All staff are responsible for reading, understanding and adhering to the terms of this policy.

4. Associated Documents

The following documents are relevant to this policy

- Email and Acceptable Use Policy
- Guidelines on the use of Social Media
- Information and Communication Systems Policy

5. Compliance with Related Policies and Agreements

5.1 Social media should never be used in a way that breaches any of our other policies. If an internet post would breach any of our policies in another forum, it will also breach them in an online forum. For example, staff are prohibited from using social media to:

- (a) Breach our [Information and Communications Systems] policy;
- (b) Breach our obligations with respect to the rules of relevant regulatory bodies;
- (c) Breach any obligations they may have relating to confidentiality;
- (d) Breach our Anti-harassment and bullying policy;
- (e) Defame or disparage the Company or its affiliates, customers, clients, business partners, suppliers, vendors or other stakeholders;
- (f) Unlawfully discriminate against other staff or third parties;
- (g) Breach our data protection policy, e.g. disclosing personal information about a colleague online;
- (h) Breach any other laws or ethical standards, e.g. using social media in a false or misleading way, such as by claiming to be someone other than yourself or by making misleading statements.

5.2 Staff should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the Company and create legal liability for both the author of the reference and the Company.

6. Personal Use of Social Media

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

7. Monitoring

7.1 The contents of our IT resources and communications systems are our property. Therefore, staff should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on our electronic information and communications systems.

7.2 We reserve the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that our rules are being complied with and for legitimate business purposes.

Document Control Ref:		Document Revision:	
Instruction:		Q:	



IMS Ref.	BPOL-19		
IMS Issue.	04		
IMS Date.	17/02/17		
Page.	3	OF	6

- 7.3 This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.
- 7.4 We may store copies of such data or communications for a period of time after they are created, and may delete such copies from time to time without notice.
- 7.4 You consent to such monitoring by your acknowledgement of this policy and your use of such resources and systems. Do not use our IT resources and communications systems for any matter that you wish to be kept private or confidential from the Company.
- 7.5 For further information regarding the Company’s monitoring procedures, please refer to our Email and Internet Acceptable Use Policy.

8. Business Use of Social Media

- 8.1 Proposals to use any social media applications as part of your role within the Company must be approved by **[NAME AND POSITION]**.
- 8.2 Following approval, you will be provided with Company ‘Guidelines for the use of Social Media’ providing guidance on its acceptable use and you may be required to undergo training before you do so. Additional requirements and restrictions regarding your activities may also be imposed on you.
- 8.2 Likewise, if you are contacted for comments about the Company for publication anywhere, including in any social media outlet, direct the inquiry to a member of the board and do not respond without written approval.

9. Recruitment

- 9.1 The popularity of social media has seen it become used by many businesses for recruitment purposes. Searching social media for candidate profiles can be a convenient and cost effective way of validating CVs or gaining insight into a candidate’s personality.
- 9.2 We may use internet searches to perform due diligence on candidates in the course of recruitment. Where we do this, we will act in accordance with our data protection, equal opportunities and referencing obligations.
- 9.3 Permission must be sought from the HR Manager before accessing the profile page of a candidate. Requests must outline:
 - (a) The social media site you wish to access;
 - (b) The reasons for accessing it; and
 - (c) Any benefits it will add to the selection process that cannot be gained through other methods.
- 9.4 After authorisation is granted, you must disclose the date, time and website to the appropriate HR Advisor along with the information retrieved from the page accessed.
- 9.5 Candidates may be informed if their profile page(s) have been, or are intended to be accessed by the Company. If anything is discovered that makes them unsuitable for the position, they will be informed and provided with an opportunity to dispute the information from their point of view.

10. Policy Enforcement

- 10.1 Breach of this policy may result in disciplinary action up to and including dismissal.
- 10.2 Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether our equipment or facilities are used for the purpose of committing the breach.

Document Control Ref:		Document Revision:	
Instruction:		Q:	



IMS Ref.	BPOL-19		
IMS Issue.	04		
IMS Date.	17/02/17		
Page.	4	OF	6

- 10.3 Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.
- 10.4 Staff may be required to remove internet postings which are deemed to constitute a breach of this policy.
- 10.5 Failure to comply with such a request may in itself result in disciplinary action.

11. Monitoring and Review

- 11.1 To ensure the policy remains efficient, effective and relevant and consistent with regulatory developments, it will be reviewed by the Head of IT in consultation with our legal representatives at least annually.
- 11.2 Recommendations for amendments will be submitted to the board for approval.
- 11.3 Employees are invited to comment on this policy and suggest ways in which it might be improved by contacting the HR Manager.

12. Guidelines for the use of Social Media

If your job duties require you to speak on behalf of the company in an online social media environment, you must still seek approval for such communication from your line manager or the Compliance Manager, who may require you to have training before you are permitted to participate in social media on behalf of BCM Construction Limited.

The guidelines below apply whether you are using social media as part of the company's strategic marketing, public relations, corporate communications, shareholder relations or recruiting activities, or as an unofficial "ambassador" on behalf of the company. Remember that if you are contacted for comment about the Company for publication, including publication in any social media outlet, you should direct the enquiry to a member of the board.

All use of social media by employees, whether for business or personal purposes, is subject to the company's Social Media Policy – Document Ref: []

1. Speak knowledgeably

Make sure that your online postings and communications reflect your level of expertise, and that you limit your comments to your area of knowledge. Before posting content, take the time to review the context and what others have said to be sure you are contributing in an appropriate way. Consider linking to colleagues' postings to build on and maximise our overall online presence.

2. Be engaging and interactive

Write in the first person and, to the extent you feel comfortable in doing so, share information about yourself that others would find interesting in order to increase the appeal of your postings. If you are blogging about the Company, identify your connection with us and your role here. Try to stimulate interest in the work that you are doing and invite a dialogue so that you can learn from others doing similar or related things.

3. Add value

Consider the value of your contribution before you post. If what you are posting helps others in the online community to solve a problem, including your peers or our customers, you are adding value. Equally, if your contribution enhances the sense of community surrounding the Company, or improves the image of our company, products or services, it is adding value.

4. Respond to your mistakes quickly

Document Control Ref:		Document Revision:	
Instruction:		Q:	



IMS Ref.	BPOL-19		
IMS Issue.	04		
IMS Date.	17/02/17		
Page.	5	OF	6

If you post something in error, act quickly to correct it. Your credibility is judged by your accuracy and your willingness to recognise and fix your mistakes. If you modify an earlier post in a blog, be upfront about doing so.

5. Don't be argumentative

Engaging in arguments and inflammatory debates can tarnish your credibility and reputation, and by association that of the Company. If you choose to disagree with fellow bloggers, do so respectfully and objectively. If you speak negatively about a competitor's business in any way, do not disparage the competitor beyond stating the facts to make your point. Be respectful to all others in the online community.

6. Be respectful

Never post anything that might be offensive to others, such as sexual comments or racial slurs. Remember that talk of religion, culture or politics can also easily offend others.

7. Comply with our policies

If your post would contravene any of our policies in another forum, it will also do so in an online forum. Do not disclose confidential or proprietary BCM Construction information; harass or discriminate against fellow employees; defame or disparage the Company or fellow employees or contravene any other Company policy by your blogging. Do not use social media in a false or misleading way, for example, by claiming to be someone other than yourself or by creating an artificial "buzz" around our business, products or shares.

8. Protect our customers, suppliers, business associates and investors

Do not cite or refer to our customers, vendors or business associates, identify them by name or reveal any confidential information related to them without getting their explicit written permission in advance. Also, do not discuss or conduct business with a customer, supplier or business associate in an online forum.

9. Do not comment on our business performance or plans

Disclosing or commenting on the Company's confidential business information is absolutely prohibited, whether in relation to sales, customer lists, financials, business or marketing plans, performance or prospects. Do not comment in any way on rumours about these. If asked directly, simply say "no comment".

10. Respect and comply with the terms of the sites you visit

Review the terms of use of all social media sites you visit and ensure your use complies with them. Pay particular attention to terms relating to:

- (a) Prohibitions or restrictions on the use of the site, such as those relating to advertising, marketing and promotions or other commercial purposes; for example, Facebook's Statement of Rights and Responsibilities (its terms of use) prohibits businesses from administering promotions through Facebook without Facebook's prior written consent.
- (b) Ownership of intellectual property used on the site, or information collected or generated through use of it (for example, any of the Company's copyright material and trademarks that might be posted on the site, or customer information that the Company collects through the site).
- (c) Requirements for licences allowing the site owner and other third parties to use the company's trademarks or other intellectual property.
- (d) Rights and responsibilities of the site owner and users relating to privacy.

11. Consequences of failure to observe these guidelines

Failure to follow these guidelines, particularly in a way that could expose BCM Construction to liability, will be subject to appropriate disciplinary procedures, and may in extremely serious cases result in termination of employment. If you are

Document Control Ref:		Document Revision:	
Instruction:		Q:	



IMS Ref.	BPOL-19		
IMS Issue.	04		
IMS Date.	17/02/17		
Page.	6	OF	6

unsure whether your planned actions might breach any of these guidelines, speak to you the Compliance Manager or the HR Manager for clarification.

12. Further information

If you have any questions about social media, these guidelines, or the Company’s expectations, please contact the Compliance Manager or the HR Manager.

Document Control Ref:		Document Revision:	
Instruction:		Q:	