

Title:	Social Media Policy
Person responsible:	Deputy Chief Executive
Customer consultation arrangement:	Consultation required? Yes ☐ No ☒ If no, please explain why: Not a customer facing policy
EIA required:	Yes
EIA completed (date):	June 2025- see completed assessment here
Approved by:	Policy Approval Working Group
Business Strategy Theme:	Quality People
Approval date:	June 2026
Links to other key policies:	ICT Policy Guidance for colleagues on the use of Whatsapp Photo Consent FAQs for Colleagues
Review date:	June 2029

Document management		
Version	Date amended	Amendments
1	July 2025	Original. Policy replaces previous 'Social Media Statement'
2	June 2026	Reference to Viva Engage added and job titles updated to reflect SLT restructure.

1. Purpose and Scope

- 1.1 South Lakes Housing (SLH) has a social media policy in place to regulate the use of social media platforms by colleagues. The policy encompasses profile pages and other resources managed by colleagues on social networking sites, along with blogs, forums, message boards, review sites, online polls and websites. Instant messaging is also included within the scope of this policy.
- 1.2 This policy outlines the expected behaviour of colleagues when using South Lakes Housing's social media platforms (including Viva Engage) and when mentioning South Lakes Housing on their personal accounts.
- 1.3 SLH's Social Media Policy is implemented in conjunction with the organisation's Information and Communication Technology (ICT) Policy. The policy should be read in conjunction with SLH's 'Guidance for colleagues on the use of Whatsapp' and 'Photo Consent FAQ's for Colleagues' (Appendix A).

- 1.4 This policy applies to all SLH colleagues, board members, independent members, contractors, and volunteers who engage with social media for either personal or professional reasons. 'Colleagues' is used as a representative term throughout this policy and covers the groups listed.

2. Regulatory and Legislative Requirements

- 2.1 This policy complies with the following legislation:
- Data Protection Act 2018
 - UK General Data Protection Regulations (GDPR)

3. Definitions

- 3.1 Social media is defined as profile pages and other resources managed by colleagues on social networking sites, along with blogs, forums, message boards, review sites, online polls and websites. Instant messaging is also included within the scope of this policy.
- 3.2 Microsoft Viva Engage is South Lakes Housing's internal employee engagement platform. It is used to support communication, collaboration, knowledge-sharing and community building across the organisation. Viva Engage is an internal platform and is not accessible to external audiences. It does not replace formal communication channels such as email, Microsoft Teams, or published policies and procedures.

4. Our Approach

- 4.1 Colleagues must use social media in the workplace in a manner that does not negatively impact SLH's reputation.
- 4.2 Social media can facilitate communication between job applicants and colleagues and serves as a channel for SLH to manage and enhance its reputation. Social media may blur the lines between home and work, with access often being public, even within a limited group of connected accounts, and comments often being permanent.
- 4.3 Colleagues should maintain honesty and respect when using social media. Content posted on social media can be traced back to the source, so colleagues must ensure that their posts, whether for work or personal use, align with South Lakes Housing's values.
- 4.4 The Deputy Chief Executive and the Communications and Marketing Partner oversee social media usage for work purposes. They will approve colleagues use of social media if it is necessary for their job and agreed upon by their line manager.
- 4.5 Personal use of social media does not require approval from SLH.
- 4.6 Whether using external social media for personal or work purposes, during

or outside working hours, posts must not:

- Compromise SLH, reveal confidential or sensitive information.
- Harm South Lakes Housing's reputation or brand.
- Violate copyright or data protection laws.
- Include libelous or defamatory content.
- Involve bullying or harassment.
- Contain illegal or offensive material.
- Disrupt your work responsibilities.
- Use SLH's name to endorse products or political views.

4.7 Colleagues must consider SLH's policies to uphold the South Lakes Housing brand and confidentiality.

4.8 Colleagues must not disclose details of SLH's operations to outsiders except for information freely available to the public. No internal company information, whether confidential or otherwise, should be posted or revealed on external social media or other internet sites, nor should organisational matters be commented on, even during after-hours or personal use.

4.9 Social media content linked to colleagues that breaches this policy, or related policies may lead to an investigation and disciplinary action under SLH's disciplinary policy.

4.10 **Use of Microsoft Viva Engage**

South Lakes Housing encourages the positive and responsible use of SLH's Viva Engage to:

- Share organisational updates, stories and good news.
- Encourage engagement and two-way communication between colleagues and leadership.
- Promote organisational values, inclusion and community.
- Support learning and collaboration across teams.

Colleagues should use Viva Engage in a way that reflects South Lakes Housing's values and maintains a respectful, professional working at all times.

4.11 **Standards of behaviour on Viva Engage**

When using Viva Engage, colleagues must:

- Communicate respectfully and professionally
- Treat others with dignity and respect
- Avoid language or behaviour that could be considered bullying, harassment, discrimination or offensive
- Ensure content shared is appropriate for a workplace environment.

4.12 **Content, confidentiality and conduct**

Colleagues must not:

- Share confidential, sensitive or personal information relating to residents, colleagues, partners or the organisation
- Post content that could damage the reputation of South Lakes Housing
- Share internal discussions, decisions or documents externally
- Use Viva Engage to raise formal complaints or grievances.

All content shared on Viva Engage may be visible to a wide internal audience and should be posted with this in mind.

4.13 Personal content and images

Appropriate personal content may be shared where it contributes positively to colleague engagement and aligns with South Lakes Housing's values. Where images include other people, colleagues must:

- Obtain consent before posting
- Follow the organisation's Photo Consent FAQs for Colleagues

4.14 Moderation and policy enforcement

Viva Engage communities are overseen by the Communications and Marketing Partner. Content that breaches this policy or related organisational policies may be removed. Breaches may be investigated and, where appropriate, managed in line with South Lakes Housing's disciplinary procedures.

5. Responsibilities

5.1 Social Media and Recruitment

Recruitment processes are increasingly using social media to engage job seekers. Given the vast amount of content posted online, reviewing candidates' social media profiles is a quick and effective way to verify details in a CV and gain insight into the candidate's personality.

SLH allows the review of candidates' social media profiles for recruitment purposes. This review must adhere to SLH's policies and code of conduct and will apply to certain roles.

5.2 Policy Enforcement

Breaching this policy through social media use will result in the removal of such content from corporate accounts and the suspension or revocation of the colleague's authorisation to use corporate social media accounts on behalf of SLH. Such content may harm SLH or its colleagues and may lead to disciplinary action under SLH's disciplinary policy, potentially resulting in serious or gross misconduct. SLH reserves the right to investigate and monitor colleagues' social media accounts if any concerns arise.

6. Monitoring & Review

- 6.1 Adherence to this policy will be monitored by the Deputy Chief Executive and the Communications and Marketing Partner.
- 6.2 This policy will be reviewed by the Senior Leadership Team at least every three years, or sooner should the need be identified e.g. following regulatory change or a change in business need.

Appendix A: Photo Consent FAQs for Colleagues

Photo Consent FAQs for Colleagues

I'm running a customer event and I'm keen for photos to be taken for SLH to share and celebrate the event

Good thinking, it's great for the work we do at SLH to be shared and celebrated. We just need to make sure it's done in a way that respects people's rights and ticks all the boxes from a data protection perspective.

If your event involves **10 or fewer people** who you're looking to take photos of- you need to make sure all participants are given a photo consent form to complete. These can be completed [via Connect](#) or using [this template](#). Make sure photos are only taken of participants who have completed the consent form. Please send the photos you have taken, alongside completed consent forms to our Communications and Marketing Partner (h.tooke@southlakeshousing.co.uk) who will keep a record of these and work with you to coordinate how the photos are used.

If your event involves **more than 10 people** who you're looking to take photos of we understand circulating consent forms isn't likely to be practical. Instead, you need to make sure signage is displayed at the event, making clear photos will be taken and informing participants who to contact if they do not want to be included. The template signage is [here](#) and should be printed and displayed clearly at the event. Photos should not be taken of anybody who states they do not wish to be included. If this can't be avoided, footage of the individual should be deleted or redacted- you should make clear to them that this will happen and inform our Communications and Marketing Partner (h.tooke@southlakeshousing.co.uk) who will process the request. Where possible, you should consider giving a verbal announcement at the event to raise awareness and ensure participants are aware of who to contact if they do not wish to be included in photography.

Does it apply to photos of colleagues too? And what about videos?

Yes, that's right- the same process should be followed for photos of colleagues at events too, where SLH may wish to share photos online or through our publications.

The same process applies to videos and photos.

Can I share photos from work on my personal social media accounts?

There are a few things you need to think about carefully before sharing photos from work on your personal social media.

- Under no circumstances can photos of our customers (taken at work or in a work context) be shared on personal social media accounts

- Any references to SLH must be in line with our Social Media Policy and the activity must not impact your ability to carry out your job role effectively
- You should ask colleagues before taking photos of them and make clear what you intend to do with the photo. Only if your colleague gives a clear, affirmative 'yes' should you move forward with taking or sharing a photo with them in. You must respect their wishes if they'd rather you didn't take or share the photo, without them having to give a reason.

There's a photo of me on the SLH website and I don't want it on there anymore

If you're not happy with an existing photo of you being on the SLH website or with it being stored or used in general, you'll need to get in touch with the Governance Team (governanceteam@southlakeshousing.co.uk) who will be happy to process your request. As it explains in our [Colleague Privacy Notice](#) you have certain rights under the UK GDPR. This includes the right to object to processing and the right to erasure of your personal data. In practice this means that by law you have the right to request your photo is removed or deleted by SLH.

There are some circumstances where SLH has a strong business need for photos of colleagues in certain positions to be shared online. This includes Housing Officers for example as there is a need for colleagues in this role to be visible in the communities we serve. In Data Protection terms, we rely on Legitimate Interest rather than consent in these circumstances. This doesn't mean we won't remove your photo if you ask us to, it just means the Governance Team might need to have more of a conversation with you about why you wish for it to be removed and agree a way forwards which considers your request alongside the needs of customers and the regulatory framework in which we operate.

Any tips for when I'm taking photos at work?

Alongside the guidance above, all colleagues taking or sharing photos from a work environment should:

- Avoid capturing personal details like car number plates or house names/numbers that can identify someone. If unavoidable, use editing software to remove or blur this information before sharing. Please ask if you need any support.
- Ensure the photo is reflective of how we would want SLH to be portrayed. Carry out a quick check to make sure there aren't any health and safety hazards shown in the picture. If you spot anything, make sure it's raised and put right.