



# BUCKINGHAM TOWN COUNCIL

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Town Clerk: Mr P. Hodson

FULL COUNCIL

Wednesday, 06 April 2022

Councillors,

You are summoned to an Extra Ordinary meeting of the **Full Council** of Buckingham Town Council to be held on Monday 11<sup>th</sup> April at 7pm in the Council Chamber, Cornwalls Meadow, Buckingham.

Please note that the meeting will be preceded by a Public Session in accordance with Standing Orders 3.e and 3.f, which will last for a maximum of 15 minutes. Members of the public can attend the meeting in person. The Council is trialling the use of video conferencing to enable the public and guests to address Council meetings virtually. If you would like to address the meeting in this way, please email [committeeclerk@buckingham-tc.gov.uk](mailto:committeeclerk@buckingham-tc.gov.uk) or call 01280 816426 for details.

The meeting can be watched live on the Town Council's YouTube channel here:  
<https://www.youtube.com/channel/UC89BUTwVpjAOEIdSlfcZC9Q/>

Mr P. Hodson  
Town Clerk

## AGENDA

### 1. Apologies for Absence

Members are asked to receive and accept apologies from members.

### 2. Declarations of Interest

To receive declarations of any personal or prejudicial interest under consideration on this agenda in accordance with the Localism Act 2011 Sections 26-34 & Schedule 4.



Twinned with Mouvaux, France;  Neukirchen-Vluyn, Germany 

Members are reminded when making decisions that the Public Sector Equality Duty 2010 requires Members to have due regard to the need to: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act, advance equality of opportunity between people who share a characteristic and those who don't, and to foster good relations between people who share a characteristic and those who don't. All Committee documents can be found on the Buckingham Town Council's website. Alternatively, the Clerk send you a copy of any minutes, reports or other information. To do this, send a request using the contact details set out above.

### **3. Determination of Code of Conduct Complaint MO2-002451**

3.1. To receive a decision from the Hearings Sub-Committee of Buckinghamshire Council

[Appendix A](#)

3.2. To receive correspondence from Buckinghamshire Council

[Appendix B](#)

3.3. To receive and discuss a written report from the Town Clerk

[BTC/132/21](#)

3.4. To note the Social Media Policy

[Appendix C](#)

3.5. To note the Social Media extract from the Staff Handbook

[Appendix D](#)

3.6. To decide “what actions if any” to take against the subject (Standing Order 14. D)

### **4. Motion – Proposed by Cllr. Jon Harvey:**

Discrimination, abuse and hate undermines the spirit and the wellbeing of our civil society here in our town. Buckingham Town Council reaffirms its policy of being against all forms of discrimination (including racism) and for inclusion, diversity and parity of esteem. Consequently, the Town Council pledges to be forever committed to making sure all members of our community are and feel included and respected, while simultaneously opposing proactively all forms of discrimination. To this end, the Town Council will actively seek out ways in which we might do this.

### **5. Chair’s Announcements**

### **6. Date of the next meetings:**

Special meeting 9th May 2022

Annual Statutory Meeting and Full Council 30<sup>th</sup> May 2022

Interim Full Council 27<sup>th</sup> June 2022



# Hearings Sub-Committee decision notice

### **SUBJECT MEMBER: Cllr Geraldine Collins**

On 13 January 2022 and on 3 March 2022 the Buckinghamshire Council Hearings Sub-Committee (the Sub-Committee) considered the complaints made concerning the alleged conduct of Cllr Geraldine Collins, a councillor of Buckingham Town Council. The Independent Person was consulted on this decision.

### **COMPLAINANTS:**

XXX  
XXX  
XXX  
XXX  
XXX  
XXX  
XXX

### **DECISION & RECOMMENDATIONS:**

The Sub-Committee found that Cllr Collins, endorsed and reposted a Facebook post while giving the impression of acting as a representative of Buckingham Town Council. The Facebook post contained comments which were offensive and subjected groups of people to personal attack. The repost and endorsement of the Facebook post was found to be offensive, subjected groups of people to personal attack and was disrespectful and inappropriate. The repost and endorsement were not part of a legitimate public debate or political expression and the repost did not attract the protection within Article 10. It was found that such conduct breached Paragraph 1 of the Buckingham Town Council Code of Conduct .

After taking into account the circumstances of the breach, the Sub-Committee accordingly made the following recommendations:

- that Buckingham Town Council should adopt a programme of equalities training for all councillors which Cllr Collins should attend;
- that Buckingham Town Council should adopt guidance and training for the use of social media for all councillors and those officers who would use social media on behalf of the council.

This decision is to be published on Buckinghamshire Council's website.

## **SUMMARY OF COMPLAINT:**

A general summary of the complaint is set out below.

### ***The Allegations***

The complaints allege a breach of the Buckingham Town Council Code of Conduct (BTC Code) by Cllr Collins when on 4 August 2020 she reposted on her personal Facebook account an alleged racist post to a fellow Councillor who was a Facebook friend. This repost remained visible on both the sender and recipient's accounts until deleted on or around 20 December 2020. The post that was reposted from Cllr Collins' account had been endorsed by the comment "thought this was good". The post had previously been posted by a third party and contained the following text: *"A passage written by an Englishman about the current situation in HIS homeland – that is thought provoking and is equally relevant in any other (once) white country."* The post was asking why whites are considered racist and no other race are. The post also contained a passage relating to the generalised commission of offences by particular ethnic groups and the treatment of the Police when dealing with law enforcement matters.

Cllr Collins disputed the allegations in that she denied that she had reposted the post and put forward an explanation that her Facebook account had been hacked or impersonated.

### ***Reasons for Decision***

#### **1) That Cllr Collins re-posted and endorsed the original Facebook post and it was in the public domain**

The basis of the complaint is that the original post was re-posted and endorsed by Cllr Collins. As Cllr Collins denied re-posting the original post at all, it was considered necessary to determine whether Cllr Collins had re-posted the original post.

Cllr Collins' position was that her account must have been hacked or impersonated. Despite Cllr Collins having made contact with Facebook in relation to the alleged unauthorised access, a response from Facebook was not forthcoming. Neither had the Police responded to reports and/or enquiries about the account or access to the account. Therefore taking into account the following: that there had been no security response indicating that the account had been accessed and relevant devices were not accessible by third parties at the relevant time; that the account looked the same as usual and did not contain any indicators of impersonation; that no new friend requests from an account in the name of Cllr Collins had been sent to any contacts indicating a duplicate account existed; that the account at the time of the post looked as it always had; that Cllr Collins was not aware of her privacy or security settings at the time of the re-post; and that there being no other explanation for the repost, the Sub-Committee concluded that on the balance of probabilities Cllr Collins' Facebook account was not hacked or impersonated at the relevant time and therefore Cllr Collins had re-posted the post.

It was further concluded by the Sub-Committee that the post was visible to the public as it came to their attention via another Facebook friend who anonymously disclosed it. As Cllr Collins was not aware of the privacy and security setting on the account (that is, that the general nature of social media means that posting, reposting or sharing even in private accounts can result in further visibility) the fact that there were then multiple complaints relating to the repost by Cllr Collins indicates that it was or became available to view in the public domain.

2) That Cllr Collins gave the impression of acting as a representative of the Council

The BTC Code states that it applies:

*“When a member of the Council...claims to act or gives the impression of acting as a representative of the Council.”*

It was accepted that the Facebook account in question was not one which Cllr Collins used for Council business and that she considered it to be a personal account. However, at the relevant times, as a result of a request by the Town Council, the profile picture of Cllr Collins’ Facebook account was of Cllr Collins dressed in Mayoral regalia. The Sub-Committee concluded this reasonably gave the impression to anyone looking at the Facebook account that the account related to Cllr Collins as a representative of the Town Council and the posts on the account were made in that capacity, rather than in her personal capacity. The BTC Code therefore applied to the conduct complained of.

3) The content of the re-shared post was unacceptable and amounted to a breach of the BTC Code

Paragraph 1 of the BTC Code states that Cllrs *“...shall behave in such a way that a reasonable person would regard as respectful.”*

‘Respect’ in this context is considered to be due regard for the feelings, wishes or rights of others and would include not being rude or offensive.

The Sub-Committee also considered guidance within the Buckinghamshire Council Code of Conduct relating to the meaning of respect as follows:

*“Respect means politeness and courtesy in behaviour, speech, and in the written word. Debate and having different views are all part of a healthy democracy. As a councillor, you can express, challenge, criticise and disagree with views, ideas, opinions and policies in a robust but civil manner. You should not, however, subject individuals, groups of people or organisations to personal attack.”*

Cllr Collins reposted the original post with the comment “thought this was good”.

The Sub-Committee concluded that this comment is, taken literally, support for the original post. No other explanation or evidence that this was not the case or context was given. It was therefore determined that Cllr Collins’ comment showed that she specifically endorsed the contents of the post in full.

In light of the above, the contents of the original post were considered. The original post contained a series of statements indicating that white people are, or would be, deemed to be racist for certain actions or practices, but the same actions or practices by other races are not considered to be racist. The Sub-Committee accepted that this is a legitimate topic for debate.

Evidence that Cllr Collins is interested in and has, as a minimum, discussed the different treatment of different races within society was accepted.

It is also accepted that councillors and the public can hold controversial or indeed racist views and there is a right to freedom of expression.

When taken in isolation the majority of statements within the original post can simply be seen as statements and comparisons which may be agreed with, or not, for a variety of reasons. The veracity of the statements was not considered.

However, one particular paragraph (commencing "*You rob us, carjack us, and rape our daughters...*") implicitly refers to the commission of criminal activity against whites by non-whites or non-English and then goes on to set out that legitimate action by white Police officers against ethnic minorities is termed racist by blacks and Asians.

The Sub-Committee considered that this paragraph was more than debate or comparison as it clearly references criminal activity, is not a full comparison, singles out specific races and is not contextual. The result of this is that the paragraph itself attacks the minorities referred to and tarnishes all individuals from that group in the same way. The wording also significantly diminishes concerns of and about racism. This paragraph could also affect the reading of the whole post, especially when the beginning of the post refers to who is 'British'.

The Sub-Committee further concluded that accordingly the endorsement of the original post did not have due regard for the feelings of the groups of people referred to in the post and as well as not being expressed in a civil manner was found to be an attack on specific ethnic minorities and was therefore disrespectful and offensive and a breach of paragraph 1 of the Code of Conduct.

Having found a breach of the BTC Code it was decided it was not necessary to make findings in respect of any further paragraphs of the BTC Code which may be engaged.

4) That the re-post by Cllr Collins does not fall within any protections under Article 10 of the Human Rights Act 1998 and the European Convention – right to freedom of expression.

The Sub-Committee considered the protections afforded by Article 10 of the Human Rights Act 1998 and the European Convention. These are for the rights of individuals to hold their own opinions and to receive and impart information and ideas without interference by public authorities. That the Act and the Convention allow for such restrictions upon freedom of expression as are required by law where this is necessary in a democratic society, for the protection of morals or for the protection of the rights of others, was also considered.

The Sub-Committee accepted that political debate and expression will be afforded higher protection and will not be restricted in the interests of democracy and the BTC Code needs to be narrowly interpreted to accommodate this. The Sub-Committee therefore carried out a weighing-up exercise between the need to maintain minimum standards in local government (which serves to maintain public confidence) and the fundamental importance of free speech in a democracy.

Under legislation, the BTC Code is to be based on various principles and councillors are expected to maintain high standards of behaviour and conduct when acting in their official capacity. The requirements for respect are based upon a number of those principles.

The Sub-Committee considered that much of the post *arguably* entailed content of legitimate public debate and is therefore deserving of the enhanced protection afforded by freedom of expression. In particular, this includes the parts about differential treatment and standards between different racial groups. However, the content of the post also included unjustified and generic attacks on a section of the public purely on the basis of their race (that is, the paragraph beginning "*You rob us, carjack us and rape our daughters*").

The Sub-Committee noted that, whilst they considered Cllr Collins gave the impression of acting in her official capacity, the post and repost was not part of an ongoing public debate, the repost was not in an immediately public forum (that is, reposted for debate purposes), the repost endorsed statements which disrespected and attacked groups of people without any indication or actual promotion of debate, those groups of people were not politicians, and those groups are themselves given protection by legislation.

On balance the Sub-Committee therefore concluded that the restrictions or requirements imposed by the BTC Code were appropriate and proportionate and the repost does not attract the higher level of protection afforded to political expression by virtue of Article 10.

**This decision is final and there is no right of appeal.**

**Signed xx**

**Cllr Thomas Broom  
Chairman Hearings Sub-Committee**

**Date 03.03.2022**



**Appendix B**  
**Directorate for Deputy Chief Executive**  
**Legal and Democratic Services**

Service Director: Nick Graham  
Postal Address:  
Buckinghamshire Council  
Walton Street Offices  
Walton Street  
Aylesbury HP20 1UA

[www.buckinghamshire.gov.uk](http://www.buckinghamshire.gov.uk)

Buckingham Town Council  
Town Council Offices  
Buckingham Centre  
Verney Close  
Buckingham  
MK18 1JP

25 March 2022

Legal Reference: IKEN DCE-PC-005385

Dear Mr Hodson,

**Re: Sub-Committee Decision Notice**  
**Hearing following a complaint against Councillor Geraldine Collins, Buckingham Town Councillor**

I refer to the above matter and attach for your information and records the Decision Notice pertaining to the above. This will be published on Buckinghamshire Council's website.

I draw your particular attention to the Sub-Committee's recommendations after taking into account the circumstances of the complaint and the decision that there had been a breach of the Members Code of Conduct, following the Hearings on 13<sup>th</sup> January and 3<sup>rd</sup> March 2022.

The Sub-Committee felt that the issues leading to the breach related to social media/technology awareness as well as equalities and in light of this felt that the best approach was to recommend training in both areas. It was also felt that whilst the focus is on training for Cllr Collins, there would be some benefit to wider training. The recommendations were therefore as follows:

- that Buckingham Town Council should adopt a programme of equalities training for all councillors which Cllr Collins should attend;
- that Buckingham Town Council should adopt guidance and training for the use of social media for all councillors and those officers who would use social media on behalf of the council.

Please note that the Sub-Committee attributed no fault at all to the Town Council and were mindful that the recommended measures may already be in place.



If you have any queries please do contact me.

Yours sincerely,

A black rectangular redaction box covering the signature area.

Nick Graham  
Service Director – Legal and Democratic Services

**Buckingham Town Council**  
**Extraordinary Full Council**  
**Monday 11<sup>th</sup> April 2022**

Contact Officer: Paul Hodson, Town Clerk

**Code of Conduct Complaint**

**1. Recommendations**

It is recommended that:

- 1.1. Equalities training be arranged for Members by the Town Clerk at the earliest date possible as part of Buckingham Town Council's ongoing good practice;
- 1.2. Members be offered appropriate social media training;
- 1.3. Members note the Buckingham Town Council Media policy which was reviewed and agreed on the 14<sup>th</sup> March 2022 - **741/21 Appendix C**;
- 1.4. Members note item 43 of the Council Handbook – Social Media Policy which was reviewed and agreed by the Resources Committee on the 10<sup>th</sup> January 2022 - **583/21 Appendix D**;
- 1.5. Members decide what, if any, action to take against Cllr. Collins.

**2. Background**

- 2.1. On Thursday 3rd March 2022 the Hearings Sub-Committee of Buckinghamshire Council published their report regarding complaints made about Cllr. Mrs G. Collins. The decision has been published on Buckinghamshire Council's website. The full printed report is attached as Appendix A. The formal decision of the Sub-Committee was that Cllr. Collins had breached Paragraph 1 of the Buckingham Town Council Code of Conduct. The decision was made using the Code of Conduct which was in place in August 2020.
- 2.2. The Sub-Committee made the following recommendations:
- 2.3. *"That Buckingham Town Council should adopt a programme of equalities training for all councillors which Cllr Collins should attend."*  
*"That Buckingham Town Council should adopt guidance and training for the use of social media for all councillors and those officers who would use social media on behalf of the council."*

2.4. As well as reiterating the recommendations from the Sub-Committee, the letter from Buckinghamshire Council to the Town Council states:

2.5. *"Please note that the Sub-Committee attributed no fault at all to the Town Council and were mindful that the recommended measures may already be in place."*

### **3. Equalities Training**

3.1. It is good practice for councillors to be provided with equalities training regularly. The Buckinghamshire and Milton Keynes Association of Local Councils have been approached to recommend appropriate equalities and social media training for councillors. Once a suitable programme of training has been identified, it is proposed that this be put in place as quickly as possible.

### **4. Social Media Policy**

4.1. Buckingham Town Council already have a media policy which was last reviewed and agreed by the Resources Committee on the 14<sup>th</sup> March 2022. This policy makes it clear that the press releases and statements should be made by the Town Clerk who is the Press Officer for the Council. Only the Town Clerk has a personalised social media account, which allows him to properly manage outgoing communications. It is not proposed to make any changes to the current policy as a suitable policy is already in place.

### **5. Social Media Training for Councillors**

5.1. It is proposed that the Town Clerk seeks suitable social media training for councillors, if possible via BMKALC, and that this is made available to councillors as soon as possible.

### **6. Staff Use of Social Media**

6.1. The report makes no reference to staff, and it is not clear why the Sub-Committee's recommendations referred to officers. It is not proposed to make any changes to the current arrangements. Buckingham Town Council Staff are governed by item 43 of the Council handbook – Social Media Policy. The Handbook was last reviewed and agreed by the Resources Committee on the 10<sup>th</sup> January 2022 - **583/21 Appendix C**. The Handbook reminds staff:

6.2. *"Staff who engage in social networking should be mindful that their postings, even if done off premises and while off duty, could have an adverse effect on the business's legitimate business interests, for example the information posted could be the business's confidential business information. In addition some people who view this information may consider you as a spokesperson for the business."*

- 6.3. *"It should be made clear to contacts and those who view social media that the views expressed are those of the member of staff alone and do not reflect the views of the business, by stating for example 'the views expressed in this post are my own. They have not been reviewed or approved by the business'."*

## 7. Possible Actions

- 7.1. The Sub-Committee's decision is final. The Town Council cannot overturn the finding that there has been a breach of the Code.
- 7.2. The Town Council's Standing Orders require that:
- 7.3. **14 d** *"Upon notification by Buckinghamshire Council that a councillor or non-councillor with voting rights has breached the Council's code of conduct, the Council shall consider what, if any, action to take against them. Such action excludes disqualification or suspension from office"*.
- 7.4. The Council may decide that the Sub-Committee's recommendations are sufficient. The Council has no power to disqualify or suspend a councillor. The Council has limited options should it wish to take further action. Possible options provided by the Local Government Association include:
- 7.4.1. the subject be removed from any or all committees or sub-committees of the authority;
  - 7.4.2. the subject member be removed from all outside appointments to which they have been appointed or nominated by the Town Council;
  - 7.4.3. the Town Council to withdraw facilities provided to the subject member by the authority for a specified period, such as a computer, website and/or email and internet access;
  - 7.4.4. the Town Council to exclude the subject member from the authority's offices or other premises for a specified period, with the exception of meeting rooms as necessary for attending council, committee and sub-committee meetings and/or restricts contact with officers to named officers only
- 7.5. Further information is provided in the Local Government Association's [Guidance on Member Model Code of Conduct Complaints Handling](#).

**Date Agreed:** 14/03/2022**Minute Number:** 741/21**Prepared by:** Paul Hodson**Version:** 2.0

This policy applies to employees, volunteers and Councillors of Buckingham Town Council.

## **1. Introduction**

1.1. Buckingham Town Council welcomes enquiries from the Press and Media and recognises its relationship with the press helps communication with residents. The Council seeks to be as transparent as possible, cooperating at all times with the press and using the opportunities of the media to publicise events, projects and works being organised.

1.2. The press are permitted to attend all meetings of the Council and its committees, unless excluded under the Public Bodies Admission to Meetings Act 1960.

## **2. Purpose**

2.1. The aim of the policy is to ensure that Buckingham Town Council communicates through the press in the best way possible, reflecting the corporate view of the Council, without inhibiting councillor's individual roles.

## **3. Scope**

3.1. The Media Policy includes:

- Official council press releases
- Councillor press correspondence
- Press protocol

3.2. The same principles apply for the written press, radio, television and other media.

## **4. Policy**

### **4.1 Council Press Releases**

- 4.1.1 Press releases and statements will be prepared and issued by the Town Clerk in consultation with Members as required;
- 4.1.2 The Town Clerk will act as the Council's Press Officer. Any official contact with the media concerning the Council's policies, the decisions it makes and services it provides are to be initiated through the Town Clerk or delegated officers;
- 4.1.3 Members who identify a media opportunity concerning the Council's policies, the decisions it makes and services it provides should discuss this with the Town Clerk who will, in consultation with other Members as appropriate, decide how this will be followed up;
- 4.1.4 If a Member or an employee receives an approach or enquiry from the media about any matter relating to the Town Council, Members are free to provide a personal view, however any queries concerning the Council's policies, the decisions it makes and services it provides should be referred to the Town Clerk;
- 4.1.5 Where possible, press releases will include a quote from the Mayor or relevant Committee Chair.

### **4.2 Councillor Press Correspondence**

4.2.1 Individual Councillors can make their own statements relating to local issues and this policy is not designed to prevent any Member expressing a personal opinion through the media. Indeed, engaging directly with the press and social media can be a key tool for members seeking to engage with residents, represent local views and take part in public debate. However, Members must make it clear that any views expressed which differ from Council policy are their own personal views and should be recorded as such;

3.4.2. Such releases, political or non-political, should bear no reference whatsoever to any officer and must not use the Council logo. Neither the Council address, telephone number nor website should be included as a point of contact;

3.4.3. Where a journalist wishes to confirm what was said by an individual Councillor during a Council meeting, they will be referred to the Town Clerk.

#### 4.3 Press Protocol

- 4.3.1 4.1. The Town Clerk is responsible for issuing official press releases on behalf of the Town Council;
- 4.3.2 4.2. When the media seeks information on an issue that is, or likely to be, subject to legal proceedings then where necessary advice will be obtained from the Council's solicitor before any response is made;
- 4.3.3 4.3. All press releases and other materials are filed for reference by the Town Clerk.

### 5. Roles

5.1 Whilst the Town Clerk is the Press Officer, the spokesperson for the Council shall be the Mayor or in his/her absence, the Deputy Mayor, or the relevant Committee Chair.

### **43. SOCIAL MEDIA POLICY**

#### **Introduction**

The growth in social media, particularly social networking sites has created increased opportunity for media communications that have an impact upon the business.

The term "social media" is used to describe dynamic and socially interactive network information and communication technologies, for example Web 2.0 sites, SMS text message and social networking sites such as Facebook, LinkedIn, Instagram, Twitter, blogs, other online journals and diaries, bulletin boards, chatrooms, micro blogging and the posting of videos on You Tube and similar media. Social networking also includes permitting or not removing postings by others where a player or employee can control the content of postings such as on a personal profile or blog.

This policy applies to social networking whilst both on and off duty.

The purpose of these social media guidelines is as follows:

- To encourage good practice
- To protect the business, its staff and clients.
- To clarify where and how existing policies and guidelines apply to social media.
- To promote effective and innovative use of social media as part of the business's activities.

#### **General Guidelines**

All current policies concerning staff apply to the use of social media these include, but are not limited to:

- Human resources: policies, procedures and codes of practice where applicable.
- Guidelines for the use of IT facilities.
- Data protection policies.
- Managing electronic mail and using e-mail wisely.
- Electronic information security policy and best practice in electronic information security.

#### **Corporate Brand Guidelines**

Staff should take effective precautions when utilising social networking sites to ensure their own personal safety and to protect against identity theft.

Staff who engage in social networking should be mindful that their postings, even if done off premises and while off duty, could have an adverse effect on the business's legitimate business interests, for example the information posted could be the business's confidential business information. In addition some people who view this information may consider you as a spokesperson for the business. To reduce the likelihood that your networking will have an adverse effect on the business, staff should observe the following guidelines when social networking.

- Staff should not engage in social networking by using any of the business's electronic resources or when they are supposed to be working.
- Managers should not send "friend" requests to subordinates at any time while on or off duty.

- Any member of staff may reject a "friend" request from any other member of staff without repercussion.
- All requests for references or recommendations, even those that are received through social networking should be handled strictly in accordance with the business's standard policy for responding to such requests.

If the social networking of any member of staff includes any information relating to the business, the following must be adhered to:

- It should be made clear to contacts and those who view social media that the views expressed are those of the member of staff alone and do not reflect the views of the business, by stating for example "the views expressed in this post are my own. They have not been reviewed or approved by the business".
- The business's performance, products or services or the products or services of its sponsors, vendors or other businesses must not be discredited or defamed in any way. Customers, clients, business partners and suppliers must not be mentioned without the prior approval of the business's management team.
- Inaccurate, distasteful or defamatory comments are prohibited. In addition, the use of, or the accessing of or the sending of offensive, obscene or indecent material is strictly prohibited.
- The business's logo, trademark or proprietary graphics or any photographs of the business premises or products or those of any other team must not be used at any time.
- Personal or contact information or photographs of any other member of staff or manager must not be posted or used at any time without permission.
- The business has spent substantial time and resources building its reputation and goodwill. These are valuable and important corporate assets, which need to be enhanced and preserved. Before any member of staff engages in any social networking activity which identifies that member of staff as an employee of the business, or that identifies the business in any way, it should be considered whether the social networking activity is damaging the business's reputation or potentially could damage the business's reputation. If there is any doubt or any uncertainty, the member of staff should refrain from posting any information. Remember, a post lives forever! Staff must think before they type.
- Any complaints about work should be resolved by speaking directly to your respective managers, rather than by posting complaints on the Internet through any method of social media. If any complaints or criticism of the business or other members of staff is posted on any method of social media, any comment that may be defamatory or damaging to the business or any other employees should be avoided. REMEMBER - Disciplinary action can be taken for this activity.
- Social networking sites are prime targets for malware distribution, and third-party applications should never be downloaded.
- Any incidences of inappropriate behaviour, information posting, phishing or suspected malware should be reported immediately to the business' Management team.



The business reserves the right at all times to continually review the use of social media and may modify its policies should the status of particular social media sites change, for example if changes are introduced or changes made to the way content is used or the terms of use of sites are changed or if a site closes down.

The business will in its sole discretion review the social networking activities of any member of its staff. This policy applies even if the social networking activity of any member of staff is anonymous or under a pseudonym. If such networking activity is engaged in, members of staff should be aware that in appropriate circumstances the business will take steps to determine the identity of the individual concerned.

The business may request in its sole and absolute discretion that any member of staff should temporarily confine their respective social networking activities to matters unrelated to the business if the business determines that it is necessary or advisable to ensure compliance with regulations or other laws.

If clarification is required on any aspect of this policy, members of staff should contact the business's management team. All members of staff should note that failure to comply with any aspect of this policy may lead to disciplinary up to and including termination, and if appropriate the business will pursue all available legal remedies to protect its reputation, products, logo, trademark or proprietary graphics. The business reserves the right in addition to report any suspected unlawful conduct to the appropriate law enforcement authority.