

Social Media Policy

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DOCUMENT STATEMENT:

All Translink Group Corporate Procedural Documentation Policies should be consistent in terms of development, approval, implementation, communication, control and review in line with these guidelines.



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Version Control Record

Policy Owner:		HR Services Manager	
Main Contributors/co- authors:		HR Management Team Social & E-Commerce Manager	
Executive Sponsor:		Chief HR & Corporate Services Officer	
Version Reviewed	Reviewed by / Consultation Sought from	Date of Consultation	Comments
1.0	HR Manager	20.10.14	No changes recommended
1.1	HR Business Partner (Bus), ER Manager, HR Manager, HR Advisor (Bus), HR Advisor (Rail) HR Advisor – temp (Rail)	06.11.14	No changes recommended
1.2	HR Services Manager Social & E-Commerce Manager	02.01.17	Executive Sponsor job title amended. Section 4 – Use of Social Networking Sites, 3 rd paragraph amended from ‘Marketing Department’ to ‘Social & E-Commerce Manager’. Section 5 – Responsibilities of all employees/workers, reference made to use of Whistleblowing Policy. References to Sharepoint amended to EDRMS. Section 7 – Review section removed as this will be in compliance with the Group Guidance on Corporate Policies and as outlined in this
2.0	HR Services Manager	02.01.18	Section 7 Related Policies amended to ‘Related documents’
2.1	HR Services Manager	15.07.20	‘Applies to’ on cover page amended to include workers and contractors.
2.2	Social & E-Commerce Manager	20.07.20	Included additional social media in Scope
2.3	HR Managers	11.11.20	Amendments to section 5 in relation to examples of inappropriate behaviour
2.4	Equality Working Group	10.12.20	Section 5 should make clear Contractors are included as well as workers

3.0	Information Manager, HR Services Manager, HR Compliance & Governance Officer and;	26.09.22	Review requested to include further information regarding use of private message services such as these are being used for work and personal purposes.
	Head of IS	22.11.22	Small wording changes to reflect capability of IS in relation to third party messaging services
	Data Governance Manager	11.1.24	Review of text changes. Added additional measures under work-related WhatsApp.

This is a controlled document. Whilst this document may be printed, the electronic version is maintained within the Corporate Records Centre within Sharepoint by the Policy Owner.

1. Introduction

Throughout this Policy, the words 'Translink' 'Company' and/or 'the Group' refer to all corporate entities under the ownership of the Northern Ireland Transport Holding Company (NITHC). This includes the parent company and each subsidiary either individually or taken together as a group.

This policy does not form part of any employee's contract of employment and may be amended at any time.

2. Scope

This policy refers to the use of social media, which includes multi-media, private and business-oriented social networking websites and messaging services (e.g., Facebook, Instagram, LinkedIn, YouTube, google+, X (formerly Twitter), Flickr, Yammer, Whatsapp, etc), and all other internet postings including blogs and wikis. The absence or lack of explicit reference to specific social media does not limit the extent of the application of this policy.

The principles of this policy should be applied to all kinds of online communication, including, for example, personal websites and blogs, discussion boards, email groups and instant messaging. The policy sets out the expectations for the conduct of employees and workers in relation to the use of social media, whether for business or personal purposes and both during and outside of working hours. It applies to access to social media using any type of internet-enabled device, whether personal or work.

This policy applies to all employees whether full time, part time, temporary or on fixed term employment, and to workers such as agency staff, casual staff or contractors who are not engaged on a company contract but are undertaking work on behalf of the company.

Breach of this policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken whether the breach is committed during working hours or otherwise and whether committed on the Company's IT facilities equipment or communication systems or otherwise.

Any staff member suspected of breaching this policy shall be required to co-operate with any Company investigation which may involve the disclosure of relevant passwords or logins and access to personal devices (where appropriate).

3. Definition of Social Networking

Social networking is defined as an online service, platform, or site that focuses on building and reflecting social networks or social relations among people, who, for example, share interests and/or activities. A social network service essentially consists of a representation of each user (often a profile), his/her social links, and a variety of additional services. Social networking sites allow users to share ideas, activities, events, and interests within their individual networks. Translink is committed to the use of social networking sites for business purposes, and this is reflected by the number of users who follow Translink on a number of sites.

4. Use of Social Networking Sites

Companies can derive benefits through engaging with social media, both at a corporate and individual level and having a corporate presence on social networking sites can lend credibility and provide a platform for encouraging responsible use.

Translink operates its own pages on social media sites to promote its services and communicate with customers. Authorised staff are trained to post to these sites and manage the communications with customers. Specifically, we have a process to address and remove any adverse, abusive, threatening or defamatory comments posted to Translink's own pages on social media sites by members of the public whether these comments are directed at Translink generally, our staff generally and/or specific staff members. Any other staff input to Translink's own pages on social media sites may compromise staff identities and reputations as well as the reputation of Translink.

In the event that a staff member is concerned as to the nature of any comment posted by a member of the public to any of Translink's social media pages concerning him/her, this should be brought to the attention of his/ her line manager, who will then report the matter to the Social & E-Commerce Manager.

Staff are not permitted to post to Translink's own pages on social media sites unless they are authorised to speak on behalf of the company. Employees are further advised that the publishing of comments onto Translink's own pages on social media sites without prior authorisation will be a breach of Translink's Social Media Policy and may lead to disciplinary action.

The company retains the copyright to any material posted to any forum, newsgroup or chat room by any employee/worker in the course of his or her duties.

Employees should be aware that the inappropriate use of such social media may amount to misconduct and may lead to disciplinary proceedings under Translink's disciplinary procedure.

5. Responsibilities of all employees/workers

When accessing and using social media and/or messaging services, employees/workers must ensure that they conduct themselves in a way which reflects positively on the organisation. When using social media outside of the work environment, employees/workers should be aware that when posting information, they are not authorised to represent Translink or express a view on behalf of Translink. Chat rooms and newsgroups are public forums where it is inappropriate to reveal confidential company information, personal data relating to other individuals, details of customer data, e.g., complaints, trade secrets or any other material covered by existing company policies and procedures. The expression of opinion on web blogs, social networks or similar sites or messaging could inadvertently reveal information which is not suitable for public consumption and employees/workers should be mindful of this and ensure they do not engage in inappropriate behaviour.

Examples of inappropriate behaviour include:

- Comments or images/photographs/videos that may damage the reputation of Translink, regardless of whether Translink is named directly or identifiable in any other manner.
- Photographs or videos of employees/workers/contractors behaving inappropriately which may be linked to Translink or which include a Translink identifier such as logos, trademarks, premises, etc.
- Falsely registering another employee/worker/contractor on social media, identifying Translink directly or indirectly.
- Posting comments or photographs of Translink co-workers and/or customers without their express consent.
- Using Translink identifiers, such as logos or trademarks without the express consent of Translink.
- Posting threatening comments, bullying or harassing co-workers, customers and others.
- Derogatory, disparaging, defamatory, discriminatory or offensive comments regarding Translink, co-workers, customers or others including, by way of example, suppliers, vendors, stakeholders or others.
- The disclosure of confidential information relating to Translink, co-workers, customers and others (e.g., sensitive financial information, safety management incidents, etc.)

The above list is not exhaustive and provides examples only.

Whilst it remains the right of an individual to bring matters of concern into the public domain, there are alternative internal mechanisms available to address such concerns, e.g., Group Whistleblowing Policy.

It is important to note that once a comment is posted on social media or in group messaging apps, it ceases to be private.

Where group messaging is created between Translink colleagues, it should be noted that this policy applies whether the group is for personal communication between peers, or for work-related reasons such as communicating working rosters. In both instances, the messaging groups may be considered an extension of your workplace and therefore conversations over these services should comply with the Social Media Policy and the Dignity at Work Policy.

Where group messaging is set up for work-related matters, there is an additional responsibility on employees to ensure that if an employee who has access to such messaging groups, leaves Translink, they should be removed from the group immediately to remove risk of data breaches and ensure confidentiality. If such a data breach is found to have occurred it should be reported immediately to the IS Helpdesk (ext. 028 90354085) in accordance with the [Cyber and Data Security Incident Management Protocol](#).

Employees should also consider additional measures such as 'admin-only' messaging to prevent unnecessary discussion with groups, and a process to approve new participants to a group. These measures exist in many platforms, including WhatsApp.

Overall, any comment which falls within the above categories, or which is otherwise considered by Translink to be against policy or to have brought the company into disrepute may be considered gross misconduct and will be dealt with under the disciplinary procedure.

Staff are advised that the Company's Dignity at Work Policy/Equal Opportunity Policy apply both in the physical workplace and online and that workplace bullying, harassment and discrimination may include bullying, harassing or discriminatory comments made by employees about colleagues online, even on their own private equipment and/or outside working hours.

6. Monitoring compliance

No employee should have any expectation of privacy as to his or her usage of the Company's IT facilities, equipment or systems. Employees with access to the Company's IT facilities, equipment or systems are referred in this respect to the Company's Cyber Liability Policy, a copy of which is issued to all staff. Further copies of the Cyber Liability Policy can be obtained from the Corporate Record Centre (CRC) or the Information Services department.

Translink reserves the right to monitor internet use and the use of social media to ensure policy compliance. This also includes the right to investigate messaging groups set up for work purposes e.g., to share work-related information, rotas, etc. Translink reserves the right to investigate personal social media sites or group messaging services if any matter comes to its attention which it considers may constitute a potential breach of this policy and/or other relevant policies.

The Company reserves the right to require the closure of any applications or removal of content published by staff members which is deemed by the Company to constitute a breach of this policy. Failure to comply with any such request may result in further disciplinary action being taken.

7. Related Documents

This policy should also be read in conjunction with other Translink documents. These include but are not restricted to:

- [Cyber Liability Policy](#)
- [Email Use and Guidance](#)
- Disciplinary Procedure
- Grievance Procedure
- [Dignity at Work Policy](#)
- [Equal Opportunity Policy](#)
- [Group Whistleblowing Policy \(Public Interest Disclosures\)](#)
- [Freedom of Information & Environmental Information Regulations](#)
- [Data Protection Policy](#)
- [Information Governance Policy](#)
- [Retention & Disposal Policy](#)

Where a policy is not hyperlinked in this list above please contact your line manager or HR to request a copy.

Social Media Policy – Frequently Asked Questions

1. Why do we need a Social Media Policy?

The recent explosive popularity of social media sites such as Facebook and X (formerly twitter) has changed the way we communicate forever. Such media attracts millions of daily users globally and gives us the chance to express our thoughts and feelings, in real time, to a wide audience. This means that our comments will have a greater impact than ever before. Unfortunately, this may not always be a positive impact. It is now easier to inadvertently cause offence and hurt other's feelings as well as damage an organisation's reputation. A Social Media Policy is therefore needed as we have a duty to protect our employees, stakeholders, brand and reputation to our customers.

2. Does this mean we're not allowed to make comments on social networking sites?

We recognise that you may wish to use social media in your personal life and this Policy does not intend to discourage nor unduly limit your personal expression or online activities. The Policy does however seek to establish a culture of openness, trust and integrity in the social media activities that we may engage in. The normal safeguards that protect us if we are offended or our reputation is damaged must therefore be extended to social networking sites.

3. Does this Policy extend to Private Forums?

Yes. The definition of social media extends to private forums as well as discussion groups, personal websites, instant messaging, blogs, vod/podcasting and even online multiplayer gaming platforms.

4. I have read a comment made about me by a colleague that may be in breach of this Policy. What should I do?

You should bring this to the attention of your Line Manager who will advise you accordingly.

5. I wish to share a Translink marketing promotion or job advertisement on my Facebook page. Am I allowed to do this?

Yes. We would encourage staff engagement and external advocacy of our products, services and organisation. You should not, however, disclose confidential information or express views on the company's behalf.

6. Surely, I have the right to speak my mind on a social media site as these comments are private and I am protected by human rights legislation?

Once you post your comments on a social media site or within a group chat on a messaging service they are in the public realm, regardless of whether or not your profile is restricted to friends only. The right to freedom of expression must always be exercised responsibly and as such, does not allow you to make comments that damage a person's or organisation's reputation or be deemed harassing by nature.

7. Will this Policy affect historical comments that I have made on social media sites - i.e., comments made before this Policy was issued to me?

As long as you are a current contractor or employee for Translink, historical comments that are inappropriate or of an offensive nature may still fall under the remit of the Dignity at Work Policy/Equal Opportunity Policy and may be investigated.

8. Social media sites are mainly accessed by staff from home or personal mobile devices. How is it possible to monitor compliance of the Policy?

Our Information Services department will continue to monitor internet use and the use of social media on company provided devices, in order to ensure compliance of this and the Cyber Liability Policy. The Company reserves the right to investigate material made on personal Facebook or similar social media sites or group messages if alerted as a result of a complaint. This is regardless of where the material comes from. Any necessary investigations will be conducted in accordance with Company policy and relevant legislation.

9. What will happen if I make a comment that is in breach of this Policy?

Any comment or action that is deemed 'inappropriate behaviour' (as defined in the Policy), or which is otherwise considered by Translink to be against policy, may be considered gross misconduct and will be dealt with under the disciplinary procedures. Gross misconduct may lead to dismissal.

10. How do I find out more about this Policy and any related Policies?

For more information regarding this policy or any other HR policy, you should speak with your line manager in the first instance. Alternatively, you can contact the Human Resources Department on 028 90277872.