



Online & Social Media Policy

Policy Last Reviewed: January 2026
This policy will be reviewed every 12 months
Policy Review Date: January 2027

Education Manager: Daniel Humpherson
Education Manager Contact Details: Dan@winnereducation.co.uk | 0121 353 1661

Introduction

This policy includes access to, and use of, the Internet and sending and receiving e-mail or text/twitter messages. Please read the policy carefully and make sure that you comply with the rules and guidance. A breach of the rules may result in legal claims against you and us, and will be regarded as a disciplinary matter and dealt with in line with our disciplinary procedure. Serious breaches will be treated as gross misconduct and could lead to summary dismissal.

Scope

This policy applies to all employees working on any computer equipment (desktop, laptop, handheld computers, workstations) belonging to Winner Education, either in our offices or elsewhere. It also applies if you bring your own laptop, palmtop or electronic diary to work.

General Rules

The systems are for business purposes.

Ownership, storage and disclosure – we own all electronic documents and files that you create.

Remember that e-mails:

- Are stored and may be inspected at any time;
- Are recorded and a hard copy can be made of them;
- Can be read by people other than the addressee; and
- May need to be disclosed in litigation.

A high degree of caution must be exercised when issuing information to outside individuals or companies. Sensitive confidential information should never be transmitted to outside individuals or companies via the facilities without the authorisation of your line manager. Care must be used in addressing data or messages to make sure that they are not sent to the wrong individual or company. In particular, exercise care in using e-mail distribution lists to make sure that all addressees are appropriate recipients of the information.

It is unlawful to send unsolicited emails or mobile telephone text messages to individuals with whom there is no existing customer relationship unless those individuals have given their consent. Any unsolicited communications sent must include wording in the title or in the text enabling the receiver to opt-out of further contact in the future. If you are informed that an individual with whom Winner Education has an existing relationship or who has previously consented to receiving information wishes to opt-out of receiving such communications in the future, you must update the data relating to that individual immediately or inform Education Manager immediately and on no account must you continue to communicate with that individual by such means.

Please take care to ensure that all messages sent via email are courteous, professional and business-like and do not contain any material, which would reflect badly on Winner Education's reputation or standing. Email messages must not contain derogatory remarks about another person, as this may constitute libel. If you receive mail containing material that is offensive or inappropriate to the office environment then you must delete it immediately. Under no circumstances should such mail be forwarded internally or externally.

Provided that it does not interfere with your performance or that of our systems the facilities *may* be used, *within reason*, for personal communications or to send and retrieve personal messages and to browse external web-sites for personal use although this should be done outside office hours or during your lunch break and be kept to a reasonable limit. If there is any evidence that this privilege is being abused then the privilege may be withdrawn. The content of personal e-mails must also comply with the restrictions set out in this policy.

The following uses of the facilities are expressly prohibited:

- Viewing internet sites which contain pornographic, obscene, abusive, slanderous or otherwise offensive material or downloading/forwarding such material.
- Communications that are in violation of company policy including, but not limited to, the transmission of defamatory, obscene, offensive or harassing messages, or messages that disclose information without appropriate authorisation.
- Duplicating copyrighted or licensed software or other information without the appropriate authorisation.
- Forwarding or otherwise perpetuating "chain-letter" type e-mail within or outside the organisation.
- Removal of any hardware or software from the premises without prior approval.

You should also not store large quantities of e-mail or downloaded files or attachments. The retention of such data utilises large amounts of storage space on both network servers and PCs, and adversely affects system performance. You should delete any e-mail messages sent or received that no longer require action or are no longer relevant. You should make hard copies of any information that you need to retain for record-keeping purposes. Employees are expected to take responsibility for their own housekeeping by keeping email boxes to a manageable size. Email box sizes may be limited by IT to maintain the efficiency of the system.

Please contact the Education Manager immediately if you receive any suspect documents, e-mail messages or computer virus alerts. Do not open attachments to any email message whose address you do not recognise. Do not forward them to any other internal or external user without the approval of the Education Manager. Any files or software downloaded from the Internet or brought from home must be virus-checked before use.

Passwords should be kept secure and are required to be changed regularly. To protect passwords, you should not access the facilities in the presence of others and confidential information should never be left open on the screen when equipment is unattended.

You should only be accessing internet information that is appropriate to your job.

You must not:

- Access or download screen-savers, games or other 'recreational' software;
- Commit to expenditure or action that which has not been authorised;
- Provide any details about Winner Education, including our e-mail address, to any third party on the internet unless you have authorisation to do so and it is in the normal course of business;
- Register with any specialist internet site unless you have a business reason;
- Set any automatic redirect of e-mail from other accounts to your Winner Education account without authorisation;
- Breach any applicable legislation.

Sites visited via the Internet are traceable, if you receive unauthorised material or gain accidental access immediately exit the site.

Protection of the System

You will be held responsible for all actions committed under your username and password.

Network connections – you must not connect a modem to any of our computers or plug unauthorised hardware into our network without permission.

Unauthorised software may only be installed by Winner Education.

Winner Education uses anti-virus software, which will be updated regularly.

Malicious Codes (including viruses) – remember that:

- You should be aware of the potential dangers of accepting programs from other sources or unsolicited software;
- You must not execute a program or open a document if you are uncertain of the expected results or you do not know the source; and
- If you detect a malicious code, notify the management immediately.

Legal and Reputational Risks

You must comply with the relevant laws and regulations for the use of our systems. If you are in any doubt as to whether an e-mail might infringe any of the below, speak to the Education Manager before sending it:

- Defamation – its global nature and the ease with which e-mail can be circulated increases the risk of libel action.
- Entering into contracts – a legally binding contract can be entered into by e-mail. You should include appropriate disclaimers to avoid entering into unintended contractual commitments.
- Discrimination/harassment – you must behave in line with the law on discrimination and harassment.
- Offensive material – all computer material is subject to the Obscene Publications Act 1959. Creating, sending, storing, displaying, posting e-mail messages or material which is obscene, abusive, insulting, violent, sexual or in any way offensive is not allowed.
- Copyright – it is an offence to copy any item of software without the appropriate permission.
- Disclosure – unless material is protected by privilege, we are required to disclose the existence of any material, including e-mails that may help or harm a party's case in the context of court litigation.
- Computer misuse – offences such as hacking, electronic eavesdropping and virus infection are prohibited by law. The maximum penalty is five years' imprisonment, an unlimited fine, or both.

Monitoring and Interception

We respect your right to privacy but have to balance this with our business requirements and the need to protect the company from harm. For this reason we may monitor and audit the use of our systems.

Automatic virus scanning – we use anti-virus software to scan all incoming and outgoing e-mail and attachments to detect and block malicious codes which could cause serious damage or loss.

Complaints – if we are made aware of possible misuse of our systems, or receive a complaint, we will normally review the content of the relevant material or messages.

Absence – to ensure that we can deal with issues arising whilst a member of staff is out of the office, it may occasionally be necessary to monitor and review the content of an individual's e-mails.

Postmaster – e-mails sent to our Postmaster address, or misaddressed will be opened and read by designated members of staff.

Etiquette

Below are some general dos and don'ts for the responsible and effective use of e-mail.

- Check your e-mail each working day, or arrange for another member of staff to do so for you.
- Take care when drafting and checking e-mails.
- Avoid using capitals as this is regarded as the equivalent of shouting.
- Keep messages polite in tone and sign off with the appropriate signature file.
- Avoid exchanges which are abusive or critical of others.
- Consider whether e-mail is the best form of communication in the circumstances. A phone call, face to face discussion or a letter may be more appropriate.
- Make it clear when your e-mail communicates a formal decision.
- If you have authority to send a message on behalf of someone else, make it clear that you are acting with their authority.

The Use of Social Media and Networking Sites

This policy outlines Winner Education's position on the use of social media and networking sites whilst at work and in the course of company business. This policy has been created to outline and protect the commercial aspects of the business, Winner Education's reputation and the reputation of its employees.

This policy must be read in conjunction with your contract of employment and you should pay particular attention to the following:

- Intellectual Property Rights.
- Confidential Information.
- Data Protection.
- Winner Education's Information Technology and Telecommunications Policy (above).

Breach of this policy may lead to disciplinary action including, in appropriate cases, dismissal. For the avoidance of doubt, this policy is intended to survive termination of the employment relationship.

Personal Use

Winner Education allows access within reason to networking sites and other social media at work for personal use, you are expected to use your lunch break for such activity.

Business Use

As a company, we recognise the benefit of using business social media and networking sites to assist you in the course of your role.

You must use your Winner Education contact details, including but not limited to e-mail address, telephone number, or other appropriate Winner Education related information at all times. Please ensure that any reference to Winner Education describes Winner Education accurately and that any text is a true reflection of our business and meets our standards of professionalism.

You should be aware that any contacts you make for business purposes, whether or not you use your Winner Education contact details, will become the property of Winner Education pursuant to the confidentiality provisions within the contract of employment. As such we advise employees not to mix personal contacts with business contacts within networking sites.

Creation of a Business Community

A business community is defined as: a network of contacts populated by clients and/or candidates used for business purposes in your role at Winner Education.

If you are going to create a business community to assist with your duties, you must adhere to the following:

- You must get approval from the Education Manager to set up a business community. Therefore, personal accounts or email addresses should not be used, but only accounts set up using the Winner Education name and e-mail address.
- Winner Education must have full access to this community therefore the Education Manager at Winner Education should be able to access this community at any time.
- Each business community developed on these sites for business purposes should be created with the full knowledge of, and must have been signed off by the Education Manager of Winner Education.
- Winner Education may review the content of such sites and lists contained within the sites to ensure correct usage.
- The information and contact details uploaded onto the site and the information received in it are and will remain the property of Winner Education and should only be used for company business.

If you have any questions regarding this policy please refer, in the first instance to Dan Humpherson at Dan@winnereducation.co.uk .