

01. Purpose

Penrith Golf Club (the Club) is committed to protecting and maintaining its reputation in every place and in every manner. This policy is intended to ensure that:

- a. the Club is not exposed to legal and governance risks through the inappropriate use of social media and that its reputation is not adversely affected and,
- b. employees of the Club are protected whilst using social media and feel empowered to contribute to collaborative online activity when it supports their role within the Club.
- c. Young people and vulnerable adults, in particular, are safeguarded with regard to their interaction with the Club, its employees, Members, Visitors or contractors.

02. Scope

This policy applies to all Members, Visitors, permanent and temporary employees, workers, and contractors of the Club and to all uses of social media.

This policy does not constitute part of an employee's terms and conditions of employment, but it is a condition of employment that employees will abide by the rules and policies made by the Club from time to time. Contractors must ensure they are aware of this policy and abide by the rules in conjunction with their contract agreement.

03. Policy Statement

Definitions

- a. Social media is an interactive online media that allows users to communicate instantly with each other or to share data in a public forum. It includes social and business networking websites such as Facebook, MySpace, Bebo, Twitter and LinkedIn. Social media also covers video and image sharing websites such as YouTube and Flickr, as well as 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 or even taking part in online polls. This is a constantly changing area with new websites being launched on a regular basis and therefore this list is not exhaustive. This policy applies in relation to any social media that employees or contractors may use.
- b. The term Users means all Members, Visitors, permanent and temporary employees, workers, volunteers, and contractors of the Club.

Use of Social Media at Work

The Club permits employees to make reasonable and appropriate use of social media websites or to keep a blog using the Club's wireless systems and equipment or their own computers or devices, such as laptops and hand-held devices, during their normal working hours, provided this does not significantly interfere with their duties or have a detrimental effect on their productivity. Employees must not spend an excessive amount of time while at work accessing social media websites.

Employees may also contribute to the Club's social media activities during normal working hours, for example by writing the Club blogs or news feeds, managing any social media account or running an official Twitter account for the Club. Employees must be aware at all times that they are representing the Club and must ensure that they act responsibly and not bring the Club into disrepute.

Users may access social media as they see fit, but the lines between public and private communications can become blurred, so Users should assume that everything written is permanent and can be viewed by anyone at any time and that everything can be traced

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back to any User. Consider the attached <u>E-Safety Checklist</u> points before establishing a social media accountor presence.

Any social media content that raises a safeguarding concern must be reported to the Welfare Officer in line with the reporting procedures, outlined in the Club's Safeguarding Policies for <u>children</u> or <u>vulnerable adults</u>.

The Club's Social Media Activities

Where Users are authorised to contribute to the Club's social media activities as part of their work, for example for marketing and promotional purposes, they must adhere to the following rules:

- Apply the same safeguards as they would with any other type of public written or oral communication about the Club.
- Ensure that any communication has a purpose and a benefit for the Club.
- Obtain permission from the Operations Manager before embarking on a public campaign using social media.
- Request the Operations Manager to check and approve content before it is published.
- Follow this and any additional guidelines given by the Club from time to time.

The social media rules set out below shall apply as appropriate.

Social Media Rules

The Club recognises that many Users make use of social media in a personal capacity. While they are not acting on behalf of the Club in these circumstances, Users must be aware that they can still cause reputational damage to the Club. Therefore, it is important that the Club has strict social media rules in place to protect its position.

When logging on to and using social media websites and blogs at any time, including for personal use Users must not:

- Conduct themselves in a way that is potentially detrimental to the Club or brings the Club or its clients, customers, contractors or suppliers into disrepute, for example by posting images or video clips that are inappropriate or links to inappropriate website content.
- Other than in relation to the Club's own social media activities or other than where expressly permitted by the Club on business networking websites, use their work email address when registering on sites or provide any link to the Club's website.
- Allow their interaction on social media to damage working relationships with or between Members, Visitors, employees and clients, customers, contractors, sponsors or suppliers of the Club for example by criticising or arguing with such persons.
- Include personal information or data about the Club's Members, employees, clients, customers, contractors, sponsors or suppliers without their express consent this could constitute a breach of the Data Protection Act 1998 which is a criminal offence.
- Make any derogatory, offensive, discriminatory, untrue, negative, critical or defamatory comments about the Club, its Members, Visitors, employees, clients, customers, contractors, sponsors or suppliers.
- Make any comments about the Club Members, Visitors or employees that could constitute unlawful discrimination, harassment, or cyber-bullying contrary to the Equality Act 2010 or post any images or video clips that are discriminatory or which

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may constitute unlawful harassment or cyber-bullying. Employees can be personally liable for their actions under the legislation.

- Disclose any trade secrets or confidential, proprietary or sensitive information belonging to the Club, its Members, employees, clients, customers, contractors, sponsors, or suppliers.
- Breach copyright or any other proprietary interest belonging to the Club, for example
 using someone else's images or written consent without permission or failing to give
 acknowledgement where permission has been given to reproduce particular work if
 Users wish to post images, photographs or videos of other Users or Club Sponsors,
 they should first obtain the other party's express permission to do so.

Users must remove any offending content immediately when asked to do so by the Club.

Work and business contacts made during the course of employment through social media websites are confidential information belonging to the Club. These should not be added to personal social networking accounts and must be surrendered on termination of employment.

Users should remember that social media websites are public, even if they have set their account privacy settings at a restricted access or 'friends only' level, and therefore they should not assume that their postings on any website will remain private.

If a User is unsure about whether a blog, tweet, post, comment or photo is acceptable, they should always consult the Operations Manager.

Users must be security conscious when using social media websites and should take appropriate steps to protect themselves from identity theft, for example by placing their privacy settings at a high level and restricting the amount of personal information they give out, e.g. date and place of birth.

Should Users notice any inaccurate information about the Club online, they should report this to the Operations Manager.

Monitoring

The Club reserves the right to monitor Users' use of social media, both during routine audits of the Club's computer systems and in specific cases where a problem is suspected. The purposes for such monitoring are to promote productivity and efficiency of staff while ensuring:

- The security of the system and its effective operation.
- That inappropriate, restricted or blocked websites are not being accessed.
- There is no breach of confidentiality.

Enforcement

Breaching the terms set out within this policy will result in the offending content being removed and the User posting it being suspended from using social media as a representative of the Club.

Published social media content that causes damage to the Club, its Members, Visitors or its employees may lead to disciplinary action being taken against the User. In respect of employees, the seriousness of the offence may amount to gross misconduct and could

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result in the employee's summary dismissal. In the case of contractors a serious offence may lead to termination of the contract.

Please report any observed violations of this policy to the Marketing Manager at: marketingmgr@penrithgolfclub.co.uk.

04. Related Policies

<u>PL2019-001 Safeguarding Children and Young People</u> <u>PL2020-005 Safeguarding Vulnerable Adults</u>

05. Implementing ProceduresNone

06. Record of Approval

Roles	2021 Responsible Person	Approval Date
Chair, Management Committee	Gideon Sharp (Acting Chair)	30-Jan-2021

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E-safety Checklist

- 1. Understand the safety aspects including what is acceptable and unacceptable behaviour when using digital technology such as social media, mobile phones, game consoles and the internet.
- 2. Before engaging with digital technology providers or social networking companies (e.g. Facebook, Twitter or MySpace, etc.) ensure that they adhere to relevant legislation and good practice guidelines.
- Review existing safeguarding policies to ensure that online safeguarding issues are fully understood:
 - a. report online concerns about possible abuse
 - b. report other breaches of terms
- 4. Decide how the Club web page or profile will be managed:
 - a. provide training for the person(s) managing the Club online profile,
 - b. involve the Club Welfare Officer or Operations Manager,
 - c. determine how social media content will be moderated,
 - d. ensure that moderation is effective.
- 5. Registration or 'signing up' to PGC
 - a. choose an appropriate email address to register or set up a profile or account
 - b. ensure appropriate security settings are set up
- 6. Ensure that adequate privacy settings are in place either restricting or allowing access to photos, personal information, comments about others, friends and followers.
- 7. Ensure that Users are aware of the need to protect their privacy online.
 - a. Users should be encouraged to carefully consider who they give access to their personal information online.
 - b. All Users should ensure that there is a clear differentiation between their personal and professional profiles.
 - c. Users should be aware that all on line data should be treated as public, not private.
- 8. Consider safety before adding content to a web page or profile:
 - a. check contact details
 - b. promote safe and responsible use
 - c. do not include personal details of children and young people
 - d. when uploading content 'think before you post'
 - e. report fake or impostor web pages or profiles.
- Promote PGC web page or profile and, where possible, use the Club email instead of using a personal email account.

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