



Social Media Policy

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1. Purpose

This policy sets out our approach in relation to the use of social media such as blogs, wikis, social networking websites, podcasts, forums, message boards, or comments on web-articles, such as Twitter, Facebook, LinkedIn etc

This policy also outlines the standards we require staff to observe when using social media, the circumstances in which we will monitor use of social media and the action we will take in respect of breaches of this policy.

2. Regulatory Requirements

FCA rules apply to all communications made by you in your capacity as our employee or which in any way relate to our services and our funeral plans and includes coverage on social media.

This policy will help us to meet the following FCA requirements:

- PRIN 2: Skill, care and due diligence –A firm must conduct its business with due skill, care and diligence
- PRIN 3: Management and control - A firm must take reasonable care to organise and control its affairs responsibly and effectively, with adequate risk management systems.
- PRIN 7: Communication with clients - A firm must pay due regard to the information needs of its clients, and communicate information to them in a way which is clear, fair and not misleading
- FPBCOB 4.2.1 - A firm must ensure that a communication or a financial promotion is fair, clear and not misleading.

3. Scope

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located.

4. Roles and Responsibilities

a) Head of Regulation

- Approving all social media postings relating to Golden Leaves
- Maintaining a register of all such approvals
- Providing appropriate training to marketers.

b) Business Areas/Staff

- Adhering to the Policy and the core requirements
- Ensuring that any company related social media postings are approved by the Head of Regulation and the CEO before it is published.

5. Personal use of social media sites

We do **not** permit the use of social media websites for personal use during company working hours.

You must also not make any communication using social media which promotes our services or any insurance products. This means:

- you must not recommend, advise, discuss, promote or mention any specific funeral plans;
- you must not discuss or recommend our funeral plans; or
- you must not invite or encourage any customer or potential customer to contact you in order to do either of the above.

You are also not permitted to add business contacts made during the course of your employment to personal social networking accounts such as Facebook accounts or LinkedIn accounts.

Any breach of these restrictions will amount to gross misconduct. If you are in any doubt as to what you can and cannot say using social media, then please contact the Head of Regulation.

6. Work related postings on social media

All communications made on social media which promote our services or any funeral products can only be made by the **CEO** or by nominated personal who have received permission from the CEO. These postings must also have been through our formal approval process, which includes approval by the Head of Regulation and the CEO.

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If you are required or permitted to use social media sites in the course of performing your duties on behalf of Golden Leaves you must not:

- a) make a false and defamatory statement about any person or organisation;
- b) add material which is offensive, obscene, criminal discriminatory, derogatory or may cause embarrassment to us, our clients or our staff;
- c) disclose confidential information about us or any of our staff or clients (which you do not have express authority to disseminate);
- d) add any other statement which is likely to create any liability (whether criminal or civil, and whether for you or us); or
- e) add any material in breach of copyright or other intellectual property rights, or which invades the privacy of any person.
- f) use data obtained in the course of your employment with us in any way which breaches the provisions of the Data Protection Act 1998.

If any employee is contacted for comments about Golden Leaves, including in any social media outlet, they must direct the inquiry to the CEO and must not respond without written approval.

7. Monitoring use of social media websites

Staff should be aware that any use of social media websites (whether or not accessed for work purposes) may be monitored and, where breaches of this policy are found, action may be taken.

We reserve the right to restrict or prevent access to certain social media websites if we consider personal use to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

Misuse of social media websites can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal liability against you and us. It may also cause embarrassment to us and to our clients.

Any such action will be addressed under our disciplinary procedure and is likely to result in summary dismissal.

If you notice any use of social media by other members of staff in breach of this policy, please report it to your line manager.

8. Annual Review

This policy will be reviewed by the CEO every year to ensure its alignment to appropriate legal and regulatory requirements as well as best practice compliance standards and its continued relevance to Golden Leaves' current and future operations. Any changes to the policy will be approved by the Board.