



Great homes  
Strong communities  
Inspired people  
for Sunderland



# Working Professionally

Policy:	Working Professionally
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Policy Owner:	Head of Human Resources
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Approved by:	Executive Team
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Scope:	This policy applies to all colleagues and *stakeholders in Gentoo
Purpose:	To define Gentoo's stance on the standards of behaviour it expects of its colleagues and *stakeholders.
Roles and Responsibilities:	<ul style="list-style-type: none"> <li>• <b>Human Resources/Governance/Marketing &amp; Communications/IT:</b> policy owner; ensure this policy is up to date, incorporates best practice and is legally compliant; provide advice and support; oversight of consistency of application.</li> <li>• <b>Colleague/Stakeholder/Individual:</b> understand and adhere to policy; ensure actions are completed in a timely manner; ensure their own behaviour and conduct is appropriate; awareness of escalation of issues; ensure their own health, safety and wellbeing.</li> <li>• <b>Manager:</b> responsible for the implementation of the policy; decision making; carrying out the required actions in a timely manner; ensure any concerns raised are taken seriously; reporting, maintaining compliance and following the policy; escalation of issues; ensure health, safety and wellbeing of colleagues; awareness and understanding of issues; ability to deal with issues.</li> <li>• <b>Executive Team (ET) / Board and Committee Members:</b> sponsor of this policy; responsible for the implementation of and compliance with the policy and procedure; decision making; carrying out the required actions in a timely manner; ensure any concerns are investigated</li> </ul>

	<p>thoroughly; ensure appropriate actions are taken to resolve a concern.</p> <ul style="list-style-type: none"> <li>• <b>External hotline:</b> understand and follow policy and procedure; deal with concerns in accordance with this policy; carrying out the required actions in a timely manner; reporting and maintaining compliance and confidentiality.</li> <li>• <b>Appropriate person:</b> deal with concerns in accordance with this policy; investigate any concerns thoroughly depending on the scale and nature of the concern, and make an objective assessment.</li> </ul>
<p>For the full version history of this policy, see the back page</p>	
<p>If you require this policy in a different format, please speak to the HR Team.</p>	

\*Board and committee members, involved residents and, other individuals performing functions in relation to the Group such as; customers, agency workers, volunteers, suppliers, contractors and other relevant stakeholders.

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## Policy Statement

This policy provides guidance on the Group’s policy and practice around working professionally. Our aim is to make Gentoo and great place to work by ensuring everyone is aware of our expectations around behaviour and professionalism to create a culture of respect and consideration of each other.

Every colleague at Gentoo is different and we want to embrace that and to empower colleagues to be able to deliver in the best possible way for our customers. We are fully committed to fostering a strong culture that drives fairness, courtesy, and respect. We aim to eliminate unlawful and unfair discrimination and value the differences that a diverse workforce brings to the business. We will not discriminate because of any other irrelevant factor and will take action to deliver fair and equitable outcomes and a culture that values openness, fairness, and transparency.

It does not form part of a colleague’s contract of employment or otherwise have any contractual effect on Gentoo’s Terms and Conditions.

**If you’re unsure about any parts of this document, please reach out to your manager or the HR Team who will be able to support you if you are taking leave.**

This policy may be varied, withdrawn or replaced at any time by Gentoo at its discretion.

## Regulation and Legislation

This policy is written in line with the following regulations and legislation;

- Employment Rights Act 1996
- Prevention of Harassment Act 1997
- Public Interest Disclosure Act 1998

- Employment Rights Act 1999
- General Data Protection Regulation 2016
- Data Protection Act 2018
- Worker Protection (Amendment of Equality Act 2010) 2024

## Our approach

Our values made by colleagues for colleagues and our approach to working professionally is underpinned by these values and our values in action, which can be found [here](#).

The Board and Executive team of Gentoo are committed to the highest possible standards in line with our Code of Conduct and of acting with integrity and professionalism at all times and the same high standards of behaviour are expected from everyone involved with its business.

We appreciate the importance of an environment and culture where everyone involved in the business is treat and treats others with respect and their actions are in keeping with our values in their day to day work.

This policy sets out the behaviour expected from all of those who play a role in the Group and provides advice and guidance to raise matters that not considered to be in-keeping with our high standards.

## Code of Conduct

The code sets standards appropriate for housing associations that are members of the NHF. The code is for use by individual colleagues, Board members and certain involved residents.

The Code is split into four main parts:

1. Acting in the best interests of the housing association and it's residents: you have a responsibility to carry out your role in line with the social purposes of the association
2. Behaving with integrity: the reputation and good name of the association depends in part on compliance with this Code, and with the laws, policies and procedures that it refers to. The integrity of those involved needs to be beyond doubt and seen so to be.
3. Conducting yourself professionally and treating others well: professionalism, consideration and respect for others and a commitment to the principles of equality, diversity and inclusion, are fundamental to the delivery of social purpose.

4. Protecting yourself, others and the environment: you have a responsibility while on the housing associations business to protect your own health, safety, security and wellbeing and that of others, and where reasonable, to make the most positive possible environmental impact.

We expect all of our colleagues and stakeholders to be familiar with and comply with the Code at all times.

The Code of Conduct can be read in full [here](#).

## Whistleblowing

It's essential we have an environment at Gentoo that colleagues feel able to raise any matters of genuine concern internally without fear of disciplinary action or blame being directed towards them. You have our assurance that any concerns will be taken seriously and the matter investigated appropriately, and as far as it is practicable, will be kept confidential (except where disclosure is required by law).

We want to encourage individuals to report suspected wrongdoing as soon as possible and some examples of this include:-

- A criminal offence
- A miscarriage of justice
- An act creating risk to health and safety
- An act causing damage to the environment
- A breach of any other legal obligation
- Someone covering up any of the above

This policy aims to:

- Provide ways for individuals to raise concerns and be informed of any action taken
- Guide individuals who wish to make a public disclosure
- Make individuals aware of how to take the matter further if they believe the appropriate action has not been taken
- Reassure individuals that by making a disclosure in accordance with this policy they will not be penalised, provided that they are not knowingly making false allegations.

## Principles

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Individuals should be alert for illegal or unethical conduct and report anything of that nature that they become aware of.

This policy is intended to assist anyone who believes that they have discovered malpractice or impropriety. It is not designed for disclosures to address the following:

- To question financial or business decisions taken by the Group
- To consider or reconsider any matters which have already been addressed under disciplinary or grievance procedures
- To investigate an individual or collective dispute for which there are established routes of complaint

## Anonymity

Individuals are strongly encouraged to put their name to allegations. However, we do appreciate that you may prefer to remain anonymous and would rather you do this than remain silent about concerns over wrongdoing.

If concerns are made anonymously they will be considered but any subsequent investigation process may not be as effective as it may not be possible to make follow up enquiries.

We will treat all disclosures confidentially and do our best to protect the identity of an individual, where reasonably practicable.

An investigation process may reveal the source of the information and a statement by the individual reporting the concern may be required as part of the evidence. An individual's anonymity may not be protected in the event of criminal or civil action being taken.

Gentoo will have appropriate recording, monitoring and reporting systems in place on disclosures under this policy.

## Protection and support

Gentoo recognises that the decision to report a concern can be a difficult one to make because of the fear of reprisal from those responsible for the alleged malpractice. Gentoo will not tolerate harassment or victimisation and will take action to protect colleagues when they raise a concern.

Individuals have a duty of confidentiality and should not report their concerns to the media. Anyone who does this may lose their protection under the Act. Individuals are encouraged to seek specialist advice from trade union representatives or the independent charity "Public Concern at Work" who can provide free advice and assistance:

- **Website**  
<http://www.pcaw.org.uk/>



- **Telephone**  
Whistleblowing Advice Line: 020 7404 6609  
General enquiries: 020 3117 2520
- **Email**  
Advice line: [whistle@pcaw.org.uk](mailto:whistle@pcaw.org.uk)

The Group's [Employee Assistance Programme \(EAP\)](#) is available for parties involved.

## Process

Please find a link to the process for submitting a Whistleblowing disclosure [here](#).

### Malicious, false or vexatious reports

Individuals will not face sanctions where they honestly believe that their information is true, regardless of whether their concern is proved to be unfounded.

The use of this policy is a serious matter and should not be used lightly. The following will be regarded as a breach of the code of conduct and may result in disciplinary action being taken against the individual concerned:

- Making false and malicious allegations
- Knowingly disclosing or providing false information
- Deliberately deter individuals from raising a concern
- An instruction to cover up wrongdoing. If told not to raise or pursue any concern, even by a person in authority, individuals should not agree to remain silent and should report the matter to the appropriate person
- Intentionally obstructing or trying to obstruct any investigation
- Victimising or harassing someone because they are preparing to raise or have raised a qualified disclosure under this procedure

## FAQs

An [FAQs](#) document is also available for questions relating to Whistleblowing.

## Prevention of Bullying and harassment

Gentoo is fully committed to providing a safe, healthy and respectful workplace and environment for all its colleagues, by:

- Creating a working environment free from harassment and bullying

- Promoting a culture that empowers colleagues with the confidence to challenge behaviour in the right way
- Having clear processes in place to enable incidents of harassment to be dealt with quickly and effectively
- Ensuring diversity, inclusion and belonging and to provide an environment in which all colleagues are treated with dignity and respect and in which they can work free from any type of discrimination, harassment, or victimisation

We support the rights and opportunities of all people to seek, obtain and hold employment without discrimination in any form. Bullying or harassment in any form, from any source, including Board members, managers, colleagues, customers, service users and contractors, is unacceptable and will not be tolerated. All allegations of bullying and harassment will be investigated and, if appropriate, disciplinary action will be taken in respect of colleagues.

We will also not tolerate victimisation of a person for making allegations of bullying and harassment in good faith or supporting someone to make such a complaint. Victimisation is a disciplinary offence.

We recognise and accept our responsibility as an employer to protect our colleagues from harassment at work, and at out of work including events such as business trips, training, social events and on social media (email or direct messaging) and acknowledge that such behaviour may be unlawful.

We expect all individuals to treat each other with dignity and respect and will not tolerate harassment or victimisation towards another person. Any person who is found responsible for such action may be dealt with under the Group's disciplinary procedures, and sanctions may be imposed on all third parties who are guilty of such action.

Additional support will be provided for colleagues who have alleged they have been subject to harassment at work.

## **Colleague responsibilities**

All colleagues have a responsibility to help create and maintain a work environment free of bullying and harassment. Colleagues are encouraged to take appropriate measures to ensure harassment does not occur including:

- Being aware of their own behaviour and the effect it may have on other people (intended or otherwise) and ensuring that their behaviour does not cause offence or mislead others about their wishes or intentions and therefore contribute to incidents of harassment
- Treating everyone with dignity and respect
- Taking a stand if they think inappropriate jokes or comments are being made

- Making it clear that they find harassment and bullying unacceptable as and when the incidents occur
- Being aware of the problems which harassment can cause
- Bringing to the attention of individuals that certain conduct or behaviour is causing concern or offence to them.

## Manager responsibilities

Managers have a particular responsibility to:

- Set a good example by their own behaviour
- Ensure that there is a supportive working environment
- Make sure that colleagues know what standards of behaviour are expected of them
- Intervene in a timely manner to stop bullying or harassment
- Report promptly to HR any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them.

Managers should be alert to the possibility of problems developing (e.g. changes in behaviour) even if no complaint has been made and be prepared to take prompt corrective action if inappropriate behaviour occurs.

## Process

Please find a link to our reporting process [here](#).

## Bullying and harassment definitions

**Bullying** is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end.

**Harassment** is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:

- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not the intention of the person responsible for the conduct

Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a "joke" or "banter" may offend another person. Different people find different things acceptable, and everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others. It is important to remember that it is the impact of the behaviour which is relevant and not the motive or intent behind it.

Behaviour that any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that behaviour of that type is not acceptable to them. It may not be so clear in advance that some other forms of behaviour would be unwelcome to, or could offend, a particular person.

Harassment may also occur where a person engages in unwanted conduct towards another person because they perceive that the recipient has a protected characteristic, when the recipient does not, in fact, have that protected characteristic. Similarly, harassment could take place where an individual is bullied or harassed because of another person who the individual is connected or associated with.

A person may feel harassed even if the unwanted conduct is not directed towards them or related to their actual or perceived protected characteristic.

There may also be circumstances in which an individual is subjected to unwanted conduct from a third party, such as a client or customer. If a colleague feels that they have been bullied or harassed by customers, suppliers, vendors, or visitors, they should report any such behaviour to their line manager who will take appropriate action. Bullying or harassment of customers, suppliers, vendors or visitors or others will be dealt with through the disciplinary procedure.

A single incident can constitute harassment if it is deemed sufficiently serious.

Bullying or harassment will constitute unlawful discrimination where it relates to a protected characteristic. Serious bullying or harassment may amount to gross misconduct and/or other civil or criminal offences.

### **Sexual harassment**

Harassment may be sexual in nature. The law defines sexual harassment as:

- Conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- Less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct

### **Examples of bullying or harassment**

Bullying and harassment may be misconduct that is physical, verbal or non-verbal or through posting on social media.

Examples of unacceptable behaviour that are covered by this policy include (but are not limited to):

- unwelcome jokes or comments of a sexual or racial nature or about an individual's age, disability, sexual orientation or religion
- excluding an individual because they are associated or connected with someone with a protected characteristic
- physical conduct ranging from unwelcome touching to serious assault
- unwelcome sexual advances or comments
- the offer of rewards for going along with sexual advances, e.g. promotion, access to training
- threats for rejecting sexual advances, e.g. suggestions that refusing advances will adversely affect the colleague's employment, evaluation, pay, advancement, assigned work, or any other condition of employment or career development
- demeaning comments about a person's appearance
- questions about a person's sex life
- unwanted nicknames related to a person's age, race or disability
- the use of obscene gestures
- ignoring an individual because they are perceived to have a protected characteristic when they do not, in fact, have the protected characteristic
- the open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person, e.g. magazines, calendars or pin-ups
- spreading malicious rumours or insulting someone
- sexual posts or contact on social media
- sending sexually explicit emails, texts or messages

**Victimisation** is subjecting a person to a detriment because they have, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing them or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because they have made a complaint or giving them a heavier or more difficult workload.

Where a colleague acts in good faith, i.e. they genuinely believe that what they are saying is true, the colleague has a right not to be victimised for making a complaint or doing anything in relation to a complaint of bullying or harassment and the organisation will take appropriate action to deal with any alleged victimisation, which may include disciplinary action against anyone found to have victimised them.

Making a complaint that a colleague knows to be untrue, or giving evidence that they know to be untrue, may lead to disciplinary action being taken against the colleague.

### **Microaggressions**

Microaggressions are statements, actions, or incidents that are regarded as indirect, subtle, or unintentional discrimination against members of a marginalised group such as a racial or ethnic minority. They are sometimes referred to as "death by a thousand cuts" due to the collective effect these comments or actions can have on the person experiencing them. Microaggressions generally take one of three forms:

- **Micro-assaults:** Conscious and obvious insults made verbally or non-verbally to a marginalised individual or group, for example directing limp-wristed hand gestures towards a gay colleague and saying, "It's just a joke".
- **Micro-insults:** Unintentionally insensitive remarks or assumptions based on stereotypes, for example saying to a person with a disability "You don't look disabled to me".
- **Micro-invalidations:** Where a person denies, or seeks to cancel, the feelings and lived experiences of a marginalised individual or group, for example a white person saying, "I don't think the UK has a problem with racism - some people are just too sensitive".

Serious microaggressions can amount to unlawful harassment, bullying or discrimination but even less serious microaggressions can negatively impact the health and wellbeing of the person experiencing them.

### Support for those affected or involved

We understand that anyone affected by, or involved with, a complaint of bullying or harassment may feel anxious or upset and we will do what we can to support them.

If a colleague feels they cannot continue to work in close contact with the alleged bully/harasser, we will consider any requested changes to their working arrangements during the investigation into the matter.

For emotional support, colleagues can access free, confidential counselling from our [Employee Assistance Programme \(EAP\)](#).

Anyone who complains or takes part in good faith in a bullying or harassment investigation must not suffer any form of detrimental treatment or victimisation. If a colleague feels they have suffered such victimisation, they should inform their line manager/the HR team as soon as possible.

Regardless of the outcome of your complaint, we will carefully consider how to best approach any ongoing working relationship between the colleague and the individual concerned. For example, depending on the specific circumstances, we may consider amending the job duties, location or reporting lines of either the colleague or the other person. Alternatively, we may decide workplace mediation or counselling is appropriate.

If you're accused of bullying or harassment and this is not found not to be true you won't suffer a detriment at work as a result. We'll also offer support if you need it.

## Sensitivity and confidentiality

Anyone involved with an informal or formal complaint about bullying or harassment, including witnesses, must keep the matter strictly confidential and act with appropriate sensitivity to all parties.

If a colleague is found to have breached confidentiality or acted without due care or sensitivity in a case of bullying or harassment, we may take disciplinary action against them up to and including dismissal (or other appropriate action for non-colleagues).

## Colleague digital behaviour

Gentoo invests substantially in information technology and communication systems to enable colleagues to work more efficiently and effectively. This policy outlines guidance for using the Group's internet, network and equipment, with the purpose to avoid inappropriate or illegal use which may create risks for the Group. For information on topics not specifically covered in this policy, colleagues should seek advice from their line manager.

This policy covers general principles of digital behaviour, email and internet usage.

This policy covers any Gentoo provided device used anywhere and at all times and any personal device on the group network or which is being used for business purposes.

## Principles

1. Colleagues are advised to use the Group's IT systems for the following reasons:
  - To carry out their role and responsibilities
  - To seek information that they can use to improve their work
  - To access their Workplace account, whilst conforming to the Social Media section of this policy.

We do not want to restrict your access; however it is expected that colleagues exercise good judgement and remain productive at work.

2. We routinely monitor the volume of internet activity and colleagues should have no expectation of privacy regarding their IT usage. However, we will only view IT usage where there is a legitimate reason to or when a concern is raised.
3. Any files or documents colleagues create on the IT systems are the property of the Group.

4. During the course of employment, colleagues may be privy to confidential or sensitive information. They should be conscious of who they share this information with and careful not to disclose such information to unauthorised recipients. Breach of confidentiality may be dealt with under the Disciplinary section of our Colleague Relations policy.

### **Digital behaviour standards**

If colleagues find themselves accidentally connected to a site that may contain/contains sexually explicit, violent or offensive material, they must leave the website immediately and inform their manager.

Passwords must be kept confidential, and colleagues must not reveal their password to anyone else, including the Group's IT team, unless access to the colleague's work account is required for continuity and/or investigatory purposes.

### **Inappropriate conduct**

Colleagues are not permitted to use the Group's IT resources to:

- Download, upload or display or send any kind of sexually explicit, violent or offensive material or messages. Such material must not be viewed, archived, stored, distributed, edited or recorded
- Visit any site or communicate information which may compromise the safety of the network or may be considered as offensive, such as anything of a racially or politically extreme, offensive or defamatory nature
- Perform unauthorised or illegal activity, such as hacking, introducing computer malware or viruses, attempts at disabling or circumventing the Groups' security systems
- Download software, images, videos or music, or any material which is protected by copyright or licencing laws, including streaming copyrighted material or playing games

### **Email, instant messaging and internet**

Under the Data Protection Act, individuals have the right to access the information stored about them, and any reference to an individual may have to be disclosed to them at some point. Colleagues must therefore be professional and respectful in all internal and external communications relating to colleagues, suppliers or customers.



Statements to avoid in electronic communications include those criticising the Group's competitors, suppliers, customers or their colleagues, or statements which are otherwise derogatory, offensive, or inappropriate for business communications. Communications should not include personal opinions of individuals and must relay facts only.

## **Use of email**

### *Email content*

Colleagues should always check the emails they intend to send with care. If colleagues use emails to send or forward messages deemed to be defamatory or otherwise inappropriate, this will be investigated in accordance with the disciplinary procedure.

Equally, if colleagues receive an inappropriate or defamatory email, whether unwittingly or otherwise and from any source, they should not forward it to anyone and are encouraged to speak with their line manager immediately.

### *Recipients*

Colleagues should exercise care when replying to an email which has an extensive distribution list and determine whether all recipients need to be included in their reply. This may prevent disclosure of confidential information to unnecessary individuals.

### *Attachments*

Colleagues should be vigilant when receiving emails with attachments from third parties, particularly unidentified third parties, as these may contain viruses. If you are unsure, you must contact our IT team before opening any attachments or clicking any links.

## **Monitoring of email usage**

We reserve the right to review colleagues' emails either to ensure the smooth running of the business or if there is a suspicion of improper usage.

## **Use of internet and instant messaging**

Where colleagues have access to the internet at work, they are expected to use it professionally and in such a manner that it does not interfere with the efficient running of the Group.

Where colleagues have access to instant messaging via our corporate systems (for example, Cisco Jabber and Microsoft Teams), they are expected to use it professionally

and in such a manner that it does not interfere with the efficient running of the Group. The Group reserve the right to ask colleagues to justify the amount of time they have spent using instant messaging.

Colleagues should always check the messages they intend to send with care. If colleagues use the system to send or forward messages deemed to be offensive, derogatory, defamatory or otherwise inappropriate, this will be investigated in accordance with the disciplinary procedure.

Equally, if colleagues receive an inappropriate, offensive or defamatory message, whether unwittingly or otherwise and from any source, they should not forward it to anyone and are encouraged to speak with their line manager immediately.

There is currently no time restriction on work-related internet or work-related messaging use. We trust you to exercise good judgement and remain productive at work.

### **Monitoring of internet and instant messaging usage**

The Group reserves the right to ask colleagues to justify the amount of time they have spent on the internet and/or the sites that they have visited.

The Group reserve the right to monitor colleagues internet usage and review colleagues' messages either to ensure the smooth running of the business or if there is a suspicion of improper usage.

### **Social media**

Gentoo recognises the importance of digital communications and that the opportunity to take part in online conversations through social media is something our colleagues will do daily.

A colleague's use of social media can pose risks to the Group's confidential information and reputation and can jeopardise our compliance with legal obligations. Social media must never be used by colleagues in a way that places Gentoo in breach of its obligations with our regulators or which breaches any law or ethical standard.

### **Definition of social media**

For the purposes of this policy, social media is a type of interactive online media that allows parties to communicate instantly with each other or to share data in a public forum. This includes but is not limited to online social forums such as Instagram, X, Facebook, LinkedIn Snapchat and Whatsapp. Social media also covers blogs, video and image sharing websites such as YouTube and TikTok.

## **Use of social media at work**

Colleagues must not access social media websites from the Group's computers or devices for non-work-related purposes. This includes laptop/hand-held computers or devices provided for work purposes.

We understand that colleagues may wish to use their own computers or devices, to access social media websites while they are at work. Colleagues must limit their use of social media on their own equipment to their official rest breaks such as their lunch break, except for the Workplace our internal communication platform.

## **Monitoring use of social media during work time**

The contents of the Group's IT resources and communications systems are the property of Gentoo. Therefore, colleagues should have no expectation of privacy in any message, email, file, data, document, fax, telephone conversation, social media post conversation or message, or any other kind of information or communications transmitted to, received, or printed from, or stored or recorded on our electronic information and communications system.

We reserve the right to monitor and review your internet usage but will endeavour to inform an affected colleague when this is to happen and the reasons for it, if appropriate. We consider that valid reasons for checking a colleague's internet usage include, but are not limited to, suspicions that the colleague has:

- been using social media websites for non-work-related reasons during work time; or
- acted in a way that is in breach of the rules set out in this policy

We may store copies of such data or communications for a period of time after they are created, and may delete such copies from time to time without notice.

Colleagues should not use our IT resources and communications systems for any personal or private reasons.

## **Business use of social media**

Business use of social media is defined as occasional and appropriate use so long as it is beneficial to improving the business and strengthening professional relationships.

Gentoo operate several accounts on social media websites for the promotion of activities and events. Colleagues who are required to use social media as part of their

job must make sure that the communication has a purpose and a benefit for the Group.

If a colleague's duties require them to speak on behalf of Gentoo in a social media environment, they must seek approval for such communication from the Marketing and Communications team. Likewise, if any colleague is contacted for comments about Gentoo for publication, including on any social media, all enquiries must be directed to the Director of Marketing and Communications.

Official Gentoo accounts on any social media website must only be set up by the Marketing and Communications team. Colleagues must not set up an account for their own division or part of the business.

All colleagues using official accounts must adhere to the below guidelines:

- Only authorised colleagues may use these accounts to post online and access to the account should be strictly limited
- Copyright laws must be respected, with references or sources cited appropriately.
- Encourage interaction with Gentoo followers and respond appropriately to comments and questions
- Deal with any negative feedback as quickly as possible and follow up problems positively and honestly.
- Adhere to the Data Protection Policy with particular attention to sharing details or photographs of colleagues or customers where consent may be required.

## **Workplace**

Workplace is our secure and internal social network. No one except our colleagues will be able to see what is posted in it.

Workplace must be used in a manner that is respectful of others' rights and opinions and ensures it is a productive and safe environment for all participants. The platform should be used in a manner that protects Gentoo and our confidential information, including customer information.

Whilst we encourage our colleagues to engage with their colleagues through Workplace in a professional manner, excessive use can impact on colleague performance and conduct.

## **Social media outside of work**

Gentoo recognises that many colleagues make use of social media in a personal capacity. While they are not acting on behalf of the Group, colleagues must understand that, if linked to Gentoo, they are responsible for their actions.

A colleague's online profile must not contain Gentoo's name. If colleagues do discuss their work or personal values on social media, they must state that their views expressed are theirs alone and do not necessarily reflect the views of the Group.

Where posts on a colleague's personal social media are brought to our attention as potentially impacting on any internal processes, such as sickness absence, disciplinary and grievance procedures, such posts may be subject to an investigation and/or referred to as part of any internal process.

Any communications that colleagues make in a personal capacity through social media must not:

1. bring the Group into disrepute, for example by:
  - criticising or arguing with, or not respecting customers, colleagues, partners and suppliers
  - making offensive, defamatory or disrespectful comments about customers, colleagues, partners or suppliers
  - posts of any nature that are inappropriate or links to inappropriate content
  - Posting communications that might be misconstrued in a way that could damage business reputation either directly or indirectly
2. breach confidentiality, for example by:
  - disclosing or sharing confidential information about an individual or Gentoo
  - discussing the Group's internal workings or its future business plans that have not been communicated to the public
  - posting any of the Group's confidential or proprietary information without prior written permission
3. breach copyright, for example by:
  - using someone else's images or written content without permission
  - failing to give acknowledgement where permission has been given to reproduce something
4. do anything that could be considered discriminatory, bullying or harassment, for example by:
  - breaching the Code of Conduct
  - making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age
  - using social media to bully another individual (such as a colleague of the Group)
  - posting images that are discriminatory or offensive or links to such content

## Protecting our business reputation and colleagues

All colleagues are responsible for protecting Gentoo's business reputation. If a colleague views content on social media that are derogatory or disrespectful or reflects poorly on Gentoo, they should contact the Director of Marketing and Communications.

## FAQs

An [FAQs](#) document is also available for questions relating to Technology and Social Media.

## Breach of policy

If a colleague breaches this policy, they may be subject to disciplinary action, up to and including dismissal.

## Data Protection

When managing each area of this policy, the Group processes personal data collected in accordance with its data protection policy. Data collected from the point at which a colleague informs the Group that they plan to take family friendly leave is held securely and accessed by, and disclosed to, individuals only for the purposes of managing their leave and eligible pay. Inappropriate access or disclosure of colleague data constitutes a data breach and should be reported in accordance with the Group's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the disciplinary procedure.

## Version Control

### Whistleblowing

Version	Reason	Issuer	Date
V1.0	Approved	A Bell	2018
V2.0	<ul style="list-style-type: none"> <li>Approved by the Chief Executive Officer and/or whole Executive Team - July 2020</li> <li>'General' deleted reference to 'orange book and red and green book</li> <li>'Contribution and Goals' added</li> <li>'Regulation and Legislation' added</li> <li>General Formatting</li> </ul>	N Young	July 2020
V3.0	<ul style="list-style-type: none"> <li>Merge of Code of conduct, Whistleblowing, Prevention of sexual harassment and Technology and Social media policies</li> <li>General formatting and tone of voice</li> <li>Legislative review by Muckle</li> <li>Introduction of FAQ's, Process and Process flow</li> </ul>	S England	August 2024

### Prevention of Bullying & Harassment

Version	Reason	Issuer	Date
V1.0	Approved	A Bell	2018
V2.0	<ul style="list-style-type: none"> <li>Approved by the Chief Executive Officer and/or Executive Team - July 2020</li> <li>Approval route amended to the Executive Director (Corporate Services)</li> <li>'Contribution and Goals' deleted detail of vision and values</li> <li>General Formatting</li> </ul>	N Young	July 2020
V3.0	<ul style="list-style-type: none"> <li>Merge of Code of conduct, Whistleblowing, Prevention of sexual harassment and Technology and Social media policies</li> <li>General formatting and tone of voice</li> <li>Legislative review by Muckle</li> </ul>	S England	August 2024

	<ul style="list-style-type: none"> <li>• Introduction of Process map</li> </ul>		
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### Technology & Social Media

Version	Reason	Issuer	Date
V1.0	Approved	A Bell	2018
V2.0	<ul style="list-style-type: none"> <li>• Approved by the Chief Executive Officer and/or whole Executive Team - July 2020</li> <li>• Approval route amended to the Chief Executive Officer and/or whole Executive Team</li> <li>• 'General' deleted reference to 'orange book and red and green book</li> <li>• 'Contribution and Goals' deleted detail of vision and values</li> <li>• General Formatting</li> <li>• Merged Social Media and Employee Digital Behaviour policy</li> <li>• Reflects data protection policy on sharing details or photographs of staff or customers</li> <li>• References usage of Jabber</li> </ul>	N Young	July 2020
V3.0	<ul style="list-style-type: none"> <li>• Policy review</li> <li>• General formatting</li> <li>• References usage of Microsoft Teams</li> </ul>	S England	Feb 2023
V4.0	<ul style="list-style-type: none"> <li>• Merge of Code of conduct, Whistleblowing, Prevention of sexual harassment and Technology and Social media policies</li> <li>• General formatting and tone of voice</li> <li>• Legislative review by Muckle</li> <li>• Introduction of FAQ's</li> </ul>	S England	August 2024