Social Media Policy

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Author/owner: Operations, Audit and Risk Committee (subcommittee of the Board of Trustees)
Review: Triennial

NB. 'Trustees' means the Directors referred to in the Trust's Articles of Association

History of most recent policy changes

Version	Date	Page	Change	Origin of Change e.g. TU request, Change in legislation
V1.0	April 2021		New policy introduced for the Tarka Learning Partnership Central Trust Team and Schools within the Trust	Requirement for central policy to set guidance and expectations for appropriate use of social media by staff in the Trust and Schools within the Trust.
V2.0	April 2023		Policy updated in line with KCSIE guidance and feedback from use/application of policy	KCSIE guidance

Contents

1. Policy statement

The Tarka Learning Partnership recognises that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media, such as Facebook, Twitter, Instagram, LinkedIn, Snapchat, WhatsApp, YouTube, blogs and wikis.

However, employees' use of social media can pose risks to the Trust's ability to safeguard children and young people, protect Trust staff, protect confidential information and reputation, and can jeopardise its compliance with legal obligations.

This could also be the case during non-working hours.

All staff using social media are also potentially at risk of others misunderstanding the intent behind online communications or blurring of professional boundaries between children and young people and their parents or carers or with other work colleagues. This policy therefore sets out the Tarka Learning Partnership's expectations regarding the use of social media, which can include the written word, images, audio and video.

To minimise these risks, to avoid loss of productivity and to ensure that the Trust's IT resources and communications systems are used only for appropriate business purposes, and that the use of personal devices does not have an adverse impact on its business therefore all employees are expected to adhere to this policy. By providing guidance on appropriate use of social media, this policy also safeguards staff and helps them to work safely.

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

2. Who is covered by this policy?

This policy covers all employees working at all levels and grades. It also applies to casual workers, contractors, and agency staff, trainees and volunteers (collectively referred to as staff in this policy).

Third parties who have access to Tarka Learning Partnership electronic communication systems and equipment are also required to comply with this policy.

3. Scope and purpose of this policy

This policy deals with the use of all forms of social media, including WhatsApp, Facebook, LinkedIn, Twitter, Instagram, TikTok, Snapchat, WhatsApp, YouTube, interactive/on-line gaming, Wikipedia, all other social networking sites, and all other internet postings, including blogs which are unrelated to education.

It applies to the use of social media for both business and personal purposes, whether during working hours or otherwise.

The policy applies regardless of whether the social media is accessed using the Tarka Learning Partnership IT facilities and equipment or equipment belonging to staff members.

A breach of this policy may result in disciplinary action up to and including dismissal. Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether Trust equipment or facilities are used for the purpose of committing the breach.

Any member of staff suspected of committing a breach of this policy will be required to co-operate with an investigation, which may involve handing over relevant passwords and login details for work equipment or accounts.

Staff may be required to remove internet postings which are deemed to constitute a breach of this policy.

Failure to comply with such a request may in itself result in disciplinary action.

This policy will be reviewed triennially.

4. Personnel responsible for implementing the policy

The Trustees have overall responsibility for the effective operation of this policy, but has delegated day-to-day responsibility for its operation to the Chief Executive Officer (CEO) and the HR Leader.

Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks also lies with the CEO and the HR Leader.

All managers have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements.

All staff are responsible for the success of this policy and should ensure that they take the time to read and understand it.

Any misuse of social media should be reported to the employee's manager, Head Teacher or CEO. Any misuse of social media concerning safeguarding issues should be reported directly to the school's Designated Safeguarding Lead.

Questions regarding the content or application of this policy should be directed to the same people.

5. Compliance with related policies and agreements

Staff should always uphold the highest professional standards and behaviours in all that they do. Social media should never be used in a way that breaches these standards, behaviours or any of other Trust policies.

If an internet post would breach any of the Tarka Learning Partnership policies in another forum, it will also breach them in an online forum.

For example, employees are prohibited from using social media to:

(a) Breach the Trust's Safeguarding policy and Keeping Children Safe in Education guidance;
(b) Breach the ICT user policy;
(c) Breach any obligations they may have relating to confidentiality;

(d) Breach the Disciplinary policy and staff Code of Conduct;
(e) Defame or disparage the Trust or its affiliates, trustees, students, parents and carers, staff, business partners, suppliers, vendors or other stakeholders.
(f) Harass or bully other staff in any way (cyberbullying);
(g) Unlawfully discriminate against other staff or third parties, harass, victimise or make slanderous comments which would be a breach the Tarka Learning Partnership's Equal Opportunities Policy and would contravene the Tarka Learning Partnership's Dignity at Work policy;
(h) Breach the Trust's Data protection policies (for example, never disclose personal information about a colleague online);
(i) Breach any other laws or ethical standards (for example, never use social media in a false or misleading way, such as by claiming to be someone other than yourself or by making misleading statements).

Staff should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the Trust and create legal liability for both the author of the reference and the Trust.

Employees who breach any of the above policies will be subject to a formal investigation following the Trust's Disciplinary Policy which may lead to disciplinary action up to and including dismissal.

6. Personal use of social media

The Trust recognises that employees may work long hours and occasionally may desire to use social media for personal activities at work or by means of the Trust's computers, networks and other IT resources and communications systems.

The Tarka Learning Partnership authorises such occasional use on the proviso that this takes place during break/lunch times only. Accessing social media on work equipment during normal working time is prohibited.

While using social media at work, circulating chain letters or other spam is never permitted. Circulating or posting commercial, personal, religious or political opinions, or promotion of inappropriate organisations are also prohibited.

Employees who breach any of the above principles will be subject to a formal investigation which may lead to disciplinary action up to and including dismissal.

7. Monitoring

The contents of IT resources, equipment and communications systems are all the property of the Tarka Learning Partnership. Therefore, staff should have no expectation of privacy in any messages, file, data, document, 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 the Trust's electronic information and communications systems.

The Tarka Learning Partnership reserves the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that Trust rules are being complied with and for legitimate business purposes and all staff consent to such monitoring by their acknowledgement of this policy and their use of such resources and systems.

This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, log-ins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.

The Tarka Learning Partnership 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.

The Trust, wherever possible, will act promptly to contact website hosts and Internet Service Providers to request the removal of content that may be damaging to the Trust including damaging to any member of staff, Trustee in the course of their employment with the Tarka Learning Partnership.

Staff should not use Trust IT resources and communications systems for any matter that they wish to be kept private or confidential from the Trust.

8. Business Use of Social Media

If work duties require a staff member to speak on behalf of the Trust in a social media environment, they must still seek approval for such communication from the Trust who may require them to undergo training before they do so and impose certain requirements and restrictions with regard to their messaging.

Likewise, if a staff member is contacted for comments about the Trust for publication anywhere, including in any social media outlet, they must direct the inquiry to the Trust central team and not respond without written approval.

The use of social media for business purposes is detailed with the Tarka Learning Partnership's Communication Strategy.

9. Recruitment

The Trust may use Social Media in relation to finding candidates (for example, if an individual has put his/her details on social media websites for the purposes of attracting prospective employers).

In line with Keeping Children Safe in Education guidance, on-line searches which includes social media will be carried out on all shortlisted candidates. The purpose of these searches is to assess candidates' suitability to work with children. This is explained to candidates via the application process. Candidates are asked to give their social media handles and are required to consent to on-line searches as part of their application for employment.

10. Responsible use of social media

The following sections of the policy provide staff with common-sense guidelines and recommendations for using social media responsibly and safely and in order to protect staff and the Trust.

Employees' use of social media can pose risks to the Trust's ability to safeguard children and young people, protect its staff, protect confidential information and its reputation, and can jeopardise the Trust's compliance with its legal obligations.

This could also be the case outside of normal working time.

Safeguarding children and young people:

(a) Staff should not communicate with pupils over social network sites. They must block unwanted communications from pupils and report them to their manager.

(b) Staff should never knowingly communicate with pupils in these forums or via a personal email account.

(c) Staff should not interact with any child on any social media site regardless of whether they are a current or ex-pupil, if the relationship is as a result of them being or having been a pupil within a school that the individual is/was employed in. It is strongly advised that social media contact with a former pupil, over the age of 18 where the original contact with them is as a result of a normal pupil/teacher relationship, should not take place.

(d) Communication with pupils should only be conducted through usual school channels.

Protecting our business reputation:

(a) Staff must not post potentially disparaging or defamatory statements about:

(i) The Tarka Learning Partnership or any of its schools;

(ii) A student/students or their parent(s) or carer(s);

(iii) The Trustees or staff;

(iv) Suppliers and vendors; and

(v) Other affiliates and stakeholders, but staff should also avoid social media communications that might be misconstrued in a way that could damage the Trust's reputation, even indirectly.

(b) Staff should make it clear in social media postings that they are speaking on their own behalf. They should write in the first person and use a personal e-mail address when communicating via social media. Communication should **never** be related to Trust business unless in line with section 8 above.

(c) Staff are personally responsible for what they communicate in social media remembering that what they publish might be available to be read by a wider audience (including the Trust itself, future employers and social acquaintances) for a long time.

(d) If staff disclose their affiliation as an employee of the Tarka Learning Partnership, they must also state that their views do not represent those of their employer.
For example, they could state, "the views in this posting do not represent the views of my employer".
Staff should also ensure that their profile and any content they post are consistent with the professional image they present to students and colleagues.

(e) Staff should avoid posting comments about sensitive Trust-related topics, such as school or Trust performance. Even if they make it clear that their views on such topics do not represent those of the Trust, the comments may still damage the Trust's reputation.

(f) If staff are uncertain or concerned about the appropriateness of any statement or posting, they should refrain from making the communication until they have discussed it with the Head Teacher.

(g) If staff see content in social media that may disparage or reflect poorly on the Trust or its stakeholders, they should print out the content and contact the Head Teacher immediately.

All staff are responsible for protecting the Trust, School and colleagues' reputation

Respecting intellectual property and confidential information:

(a) Staff should not do anything to jeopardise confidential information and intellectual property of the Trust through the use of social media.

(b) In addition, staff should avoid misappropriating or infringing the intellectual property of other companies and individuals, which can create liability for the Trust, as well as the individual author.

(c) Staff should not use Trust or school logos, brand names, slogans or other trademarks, or post any of our confidential or proprietary information without prior written permission.

Respecting colleagues, students, parents and carers, Trustees and other stakeholders:

(a) Staff must not post anything that their colleagues or school pupils, parents and carers, Trustees and other stakeholders may find offensive, including discriminatory or slanderous comments, insults or obscenity.

(b) Staff must not post anything related to their colleagues or our customers, clients, business partners, suppliers, vendors or other stakeholders without their written permission.

APPENDIX 1 – EMPLOYEE GUIDE ON USING SOCIAL MEDIA

This guidance is intended to provide best practice considerations and potential implications on employment.

- Employees should exercise reasonable professional caution in their use of all social media, including written content, videos or photographs, and views expressed.
- Employees should consider the security settings of their account and personal profiles.
- Employees must only contact students via Trust authorised mechanisms. At no time, in any circumstances, should personal accounts on social media platforms be used to communicate with pupils (including ex/former pupils).
- Employees must report to the Head Teacher/Designated Safeguarding Lead any contact by a pupil by an inappropriate route.
- Employees should consider including a disclaimer on their personal social media profile to clearly identify that the account does not represent the Trust's views or opinions. For example: *'The views expressed are my own and do not reflect the views of my employer.'*

The intention of this guidance is to provide clarity on the considerations for reasonable professional caution in posting on social media however it is recognised much of this is down to perception and common sense approaches. In particular, any ***content that is inappropriate*** should not be included is messages, status updates or links to other materials.

Inappropriate content includes: pornography, racial or religious slurs, gender-specific comments, information encouraging criminal skills or terrorism, or materials relating to cults, gambling and illegal drugs. This definition of inappropriate content or material also covers any text, images or other media that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs in support of proscribed terrorist groups or organisations, national origin, disability, sexual orientation, or any other characteristic protected by law.

Use During the Working Day

Systems across the Trust and its devices may provide access to the internet and social media platforms for employees to reasonably use during their break times. In addition individuals may have access to their own devices while at work, such as mobile phones or tablets.

However it is expected that employees act responsibly and ensure their productivity isn't affected by such use. Using social media during normal working time is inappropriate use may be considered a disciplinary matter.

Monitoring

The Tarka Learning Partnership's ICT and internet resources (including computers, smart phones and internet connections) are provided for legitimate business use and any personal use should be limited to the employee's non-working time. The Trust therefore reserves the right to monitor how social networks are used and accessed through these resources.

Any such examinations or monitoring will only be carried out by authorised staff and reported to the senior manager of the individual employee for consideration on appropriate action which may include performance management or disciplinary matters in accordance with the relevant policies.

It should be noted that the Trust can be legally compelled to show that information to law enforcement agencies or other parties as applicable.

APPENDIX 2 – SOCIAL MEDIA CONTACTS – A GUIDE TO SAFEGUARDING FOR EMPLOYEES

SAFEGUARD YOURSELF

- Risk assess your social media presence and contacts
- Maintain professional standards when using social media
- Check your privacy settings and who can see your posts

REMEMBER

- Children under 13 should not have a social media account

PRINCIPLE
The overriding principle is that if contact with the person is solely due to the pupil/professional relationship you are strongly advised not to follow this contact up.

CONTACT SCENARIOS – RISK ASSESS THE ORIGINS OF THE CONTACT

Current pupil – the origin of your contact with this child is as a result of your professional role and relationship with them	DO NOT ACCEPT THE CONTACT
Former/ex-pupil – the origin of your contact with this person (child or adult) is solely as a result of your professional role and relationship with them	DO NOT ACCEPT THE CONTACT

Charity/community work Your relationship and contact with this pupil/former pupil is as a result of charity work or a community group that you are both involved in	ACCEPT IF PART OF A GROUP
Sport/recreational interest group Your relationship and contact with this pupil/former pupil is as a result of both being in a club/recreational interest group that you are both involved in. If the pupil/former pupil makes contact with you as they know you have an interest in a sport/activity but you have no other association or club links.	ACCEPT IF PART OF A GROUP DO NOT ACCEPT THE CONTACT
Family groups Your relationship and contact with this pupil/former pupil is because they are a family member for example; your niece/son-in-law/girlfriend of family member. Consider the origins of the relationship with this person i.e. is it as a result of the family tie?	ACCEPT THE CONTACT IF YOU FEEL SATISFIED IT IS APPROPRIATE
Friendship groups Your relationship and contact with this pupil/former pupil is because they are a friend or family member of a close friend of yours. For example the nephew or niece/son-in-law/girlfriend of a close friend. Consider the origins of the relationship with this person i.e. is it as a result of the friendship?	ACCEPT THE CONTACT IF YOU FEEL SATISFIED IT IS APPROPRIATE