

# Social Media Policy

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| <b>Audience:</b>                                     | All employees  |
| <b>Approved:</b>                                     | HR Committee December 2019   |
| <b>Other related policies:</b>                       | <ul style="list-style-type: none"> <li>• Employee Handbook</li> <li>• Dignity at Work Policy</li> <li>• Equalities Duty Framework</li> <li>• Information Security Policy</li> <li>• Freedom of Information and Data Protection Policy and Procedure</li> <li>• Whistleblowing Procedure</li> <li>• Disciplinary Procedure</li> </ul> |
| <b>Policy owner:</b>                                 | Director of HR   |
| <b>Consultation with trade union representatives</b> | December 2019  |
| <b>Version number:</b>                               | Version 2:<br>December 2019  |
| <b>Review:</b>                                       | November 2021 (2 years)  |

# REAch2 Social Media Policy



At REAch2, our actions and our intentions as school leaders are guided by our Touchstones:

- Integrity** We recognise that we lead by example and if we want children to grow up to behave appropriately and with integrity then we must model this behaviour
- Responsibility** We act judiciously with sensitivity and care. We don't make excuses, but mindfully answer for actions and continually seek to make improvements
- Inclusion** We acknowledge and celebrate that all people are different and can play a role in the REAch2 family whatever their background or learning style
- Enjoyment** Providing learning that is relevant, motivating and engaging releases a child's curiosity and fun, so that a task can be tackled and their goals achieved
- Inspiration** Inspiration breathes life into our schools. Introducing children to influential experiences of people and place, motivates them to live their lives to the full
- Learning** Children and adults will flourish in their learning and through learning discover a future that is worth pursuing
- Leadership** REAch2 aspires for high quality leadership by seeking out talent, developing potential and spotting the possible in people as well as the actual

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## **1.0 Policy Overview**

- 1.1 Social media is a commonly used term to refer to internet-based communication tools that can be accessed on computers, tablets and smart phones which allow users to interact with one another, to share information and to express ideas and views. Popular social media platforms include Facebook, WhatsApp, Twitter, Instagram, and Pinterest. These internet-based communication tools are often used to rediscover friends on social networking sites such as Facebook, to keep up with other people's lives on Twitter as well as maintaining webpages for business and personal purposes.
- 1.2. REAch2 Academy Trust (the Trust) recognises the benefits of social media, to enable positive communications to increase parental engagement, to network, to share learning and best practice, to showcase the work of pupils and to promote schools' successes, to attract talented staff and to building relationships with parents and within local and national communities.
- 1.3. It's crucial that pupils, parents and the public have confidence in the Trust's decisions and services. Staff members must therefore be conscious at all times, when they are using social media, of the need to keep their personal and professional lives separate and to be mindful of their responsibility to protect the reputation of the Trust.

## **2.0 Overarching principles**

- 2.1 This policy sets out the principles that all employees and representatives of the Trust are expected to follow when using internet-based communication tools.
  - 1.1 This policy applies to REAch2 employees, including all Trust central staff and anyone employed within a REAch2 Academy in any role or appointed to represent or undertake work on behalf of the Trust or its Academies.
  - 1.2 The principles set out in this policy are designed to ensure social media is used responsibly so that the confidentiality of pupils and those working for the Trust, as well as the reputation of the Trust and its academies, are safeguarded.

## **2.0 Intended Impact**

- 2.1 The purpose of this policy is to:
  - Protect REAch2 and REAch2 academies from legal risks;
  - Ensure that the reputation of REAch2, its academies, staff and representatives are protected;
  - Ensure that staff members are able to determine where information provided via social media is legitimately representative of REAch2;
  - to protect staff from allegations and misinterpretations that can arise from the improper use of social networking sites.
- 2.2 Any reference to REAch2 'staff members' in this policy includes all REAch2 employees (central, regional or Academy-based), the Trust Board of Directors, Local Governing Bodies, all workers and independent contractors, teacher trainees and other trainees, volunteers and other individuals appointed to provide services on behalf of the Trust or its academies.
- 2.3 This policy covers personal use of social media as well as work-related online activities for official Trust purposes, including websites hosted and maintained on behalf of the Trust and its academies.

2.4 This policy applies to personal web-spaces/accounts such as, social networking sites (for example Facebook, WhatsApp, Instagram), blogs, microblogs such as Twitter, chatrooms, forums, podcasts, open access online encyclopaedias such as Wikipedia, social bookmarking sites such as Pinterest and content sharing sites such as Flickr and YouTube. This list is not exhaustive and the principles set out in this policy must be followed irrespective of the medium used.

### **3.0 Acceptable Use Principles**

3.1 Staff members are required to be professional and respectful at all times when using social media and conscious of the need to keep personal and professional lives separate. Staff members are strongly advised not to put themselves in a position where there is potential conflict between work-related matters and personal activities.

3.2 Staff members should ensure that neither the Trust's or its Academies' reputation is compromised by making or sharing inappropriate postings on personal social media networking sites.

3.3 Staff members should avoid expressing their own views and opinions as if they were speaking on behalf of the Trust, unless they are communicating in an official capacity as a spokesperson of REAch2. This will help to safeguard the Trust's wider reputation and to protect the privacy of individuals, particularly those involved in providing frontline services on behalf of the Trust or its academies.

3.4 Any information obtained or accessed whilst undertaking, or involving, work-related duties (including personal, sensitive, corporate or other confidential information regarding the Trust, its academies, its employees or representatives, pupils and their family members), must not be disclosed or shared via personal web-spaces; nor without express authorisation from a senior Trust/Academy representative.

3.5 In their capacity as an employee, no member of staff should request, or accept, any current pupil of any age or any ex-pupil of the school under the age of 18 as a friend, follower, subscriber or similar on any personal social media account, with the exception of relatives or with friends who are also parents / carers of a pupil.

3.6 Staff members must only use official Academy or Trust sites for communicating with pupils or to enable pupils to communicate with one another. Social media contact with any child or young person under the age of 18, other than a child who is related to them, could call a staff member's personal reputation into question. Staff members are not permitted to have personal contact with any pupil, whether from their academy or any other academy/school, unless the pupil is a family member.

3.7 Users are not permitted to discuss personal information about other pupils, REAch2 Academy Trust, any REAch2 school or the wider community they interact with via any personal social media. Staff should refrain from posting or sharing online comments that refer to specific, individual matters related to the Trust, its academies or members of the wider Trust community on any social media accounts.

3.8 Staff members should consider the reputation of the Trust and any of its academies in any online posts or comments made via personal web-space accounts and take care not to expose the Trust to unwelcome or negative publicity or potential reputational damage. Staff members should not represent their personal views as those of REAch2 Academy Trust or any of its Academies on any online or social media platform and should refrain from making any derogatory, defamatory, threatening or inappropriate comments about work-related matters, the Trust, any of its academies or anyone working for, or connected with, the Trust.

- 3.9 Any work-related complaints or grievances should not be raised or shared via social media or public online platforms. Staff members should address any such concerns through the appropriate channels in accordance with the Trust's or the academy's internal policies and procedures.
- 3.10 Any serious incidents involving the need to safeguard particular pupils or staff members, or any other matter carrying the potential to damage the reputation of the Trust or its academies, must immediately be raised with the academy's Senior Leadership Team, Local Governing Body or with a member of the Trust's senior leadership team. Where necessary, management should seek advice from HR.

## **IMPLEMENTATION**

### **Personal Use**

- 5.1 Staff members must not use work-related email addresses to set up personal social media accounts nor to communicate with individuals for personal purposes. The academy or Trust corporate, badges, logos or brands must not be used or published on personal web-spaces, unless it is to conduct Trust business and with permission, eg promote a vacancy via LinkedIn.
- 5.2 Staff members should not use personal social media accounts, email addresses or phone numbers to make contact with members of the Trust community on official business, nor should any such contact be accepted, except in circumstances where express consent has been confirmed by the relevant individuals.
- 5.3 Staff members are strongly advised to keep their personal passwords confidential and to ensure that the privacy levels of their personal web-space accounts are set as strictly as reasonably possible. Staff are also advised to opt out of public listings on social networking sites to protect their own privacy.
- 5.4 Staff members must be mindful about what is posted online. Photographs, videos or any other types of image of pupils and their families; or images depicting pupils or staff members wearing academy or Trust uniforms or clothing with academy or Trust logos or images identifying an academy or Trust premises, must not be published on personal web-spaces without permission.
- 5.5 REAch2 Academy Trust only permits limited personal use of social media whilst at work during break and lunch times but does not permit personal use of social media during PPA time. Staff members are expected to devote their full contracted hours of work to their professional duties, and personal use of the internet is not permitted during paid working time without permission.

### **Official Use On Behalf of the Trust**

- 6.0 REAch2 has full responsibility for running the Trust's official website, Facebook, Twitter, LinkedIn and YouTube sites.
- 6.1 Individual Academies shall be responsible for creating and maintaining their own official social media accounts for school-related purposes.
- 6.2 No other social media platforms may be set up by any member of the Trust community, without proper express approval from an authorised senior representative of the Trust or the Academy.
- 6.3 All staff who wish to participate in official work-related social media platforms and communications are strongly advised to discuss their intentions with their line manager in the first instance in order to obtain approval from a suitably authorised senior representative of the Trust or the Academy.

## **Recruitment and Equality**

- 7.1 The Equality Act 2010 affords protection from unlawful discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation (protected characteristics).
- 7.2 The Trust believes that having a workforce that reflects the local communities it serves will help to deliver teaching and learning services and experiences to meet the diverse needs of the pupils and their families.
- 7.3 When screening and shortlisting applicants, recruiting managers must ensure that they remain objective and open-minded. Recruiting managers must follow the Trust's or the Academy's Recruitment policy, including safer recruitment principles, to minimise the risk of legal action and to ensure that successful candidates are justifiably selected based on credibility and merit.

## **Legal Considerations**

- 8.1 The widespread availability and use of social media applications bring opportunities to understand, engage, and communicate in new and exciting ways. It is probable that a high number of staff members hold their own personal social media accounts therefore, it is important that we are able to use these technologies and services effectively and appropriately in consideration of the Trust's legal obligations and our public reputation.
- 8.2 All individuals working on behalf of the Trust are legally bound by a duty of confidence to protect the confidential information they have access to during the course of their work.
- 8.3 Social networking also has implications in relation to the statutory duty to safeguard children, and young people . The policy requirements in this document aim to provide a framework of good and acceptable practice.
- 8.4 All staff members should be mindful that information they share through social networking applications is still subject to copyright, General Data Protection Regulations and Freedom of Information legislation, the Safeguarding Vulnerable Groups Act 2006 and other legislation, including The Human Rights Act 1998.
- 8.5 Disclosure of confidential information on social media may breach the law and professional codes of conduct. Confidential information includes, but is not limited to:
  - Person-identifiable information, e.g. pupil and employee records;
  - Information divulged in circumstances where there is a reasonable expectation of confidentiality;
  - REAch2 Trust/Academy business or corporate records containing organisational or publicly sensitive information;
  - Any commercially sensitive information, such as information relating to business proposals or current negotiations;
  - Politically sensitive information.
- 8.6 Staff members should also be aware that other laws relating to libel, defamation, harassment and copyright may apply to information posted on social media, including Libel Act 1843; Defamation Acts 1952 and 1996; Protection from Harassment Act 1997; Criminal Justice and Public Order Act 1994; Malicious Communications Act 1998; Communications Act 2003, and Copyright, Designs and Patents Act 1988.

8.7 The Trust could be held vicariously liable for the actions of its staff members in the course of their employment. For example, staff members who harass colleagues online; those who engage or participate in cyberbullying or harassment; any acts of unlawful discrimination; the defamation of a third party whilst at work may render the Trust liable to the injured party.

### **Breaches of this policy**

9.0 Online conduct is considered in the same way as offline conduct. Staff members should not assume that comments made online are (or will remain) private.

9.1 Staff members must not publish or share any content that may result in litigation for defamation, discrimination, breaches of copyright, data protection or other claim for damages. This includes but is not limited to material of an illegal, sexual or obscene nature that may bring the Trust or its Academies into disrepute.

9.2 Staff members should be mindful of professional standards associated with their job role, irrespective of whether their actions are online, offline, before, during or after working hours. Staff members must not breach any of the Trust's or the Academy's Codes of Conduct or other internal policies or reasonable expectations relating to those employed by the Trust or its Academies, including Equality, Safeguarding and Child Protection and Dignity at Work.

9.3 Breaches of this policy will be taken seriously and will be addressed under the Trust's Disciplinary Policy as necessary. Any form of unacceptable conduct that gives rise to legitimate claims of unlawful discrimination, defamation, breaches of confidentiality; or any other actions or negligence that render the Academy or the Trust liable to third parties, may result in formal disciplinary action up to and including dismissal.

9.4 The following incidents are likely to be considered as gross misconduct and, subject to a reasonable and fair investigation process, may result in dismissal without notice (summary dismissal):

- Wilful non-compliance with confidentiality and data protection principles, for example deliberate or reckless disclosure(s) of personal data held by the Trust or its Academies without proper authority (this may also be considered as a criminal offence).
- Wholly inappropriate use of any computer equipment, mobile device or program/software provided by the Trust or its Academies for work-related purposes, including deliberately accessing internet sites containing pornographic, offensive or obscene material;
- A serious breach of trust and confidence, including the publishing, displaying or sharing of pornographic, offensive or obscene material or images;
- Unlawful discrimination, bullying, harassment or serious mistreatment of any pupils, colleagues, employees, parents or members of the public on the grounds of race, gender, sexual orientation, religious belief, disability, marital status, age, gender reassignment or ethnic origin;
- Abusive or threatening conduct towards any pupils, colleagues, employees, parents or members of the public, including serious instance(s) of exclusion, victimisation, derogatory comments, demeaning jokes or, spreading malicious rumours about an individual that has the effect of causing offense, distress, embarrassment, humiliation and/or intimidation.

9.5 Contracted service providers working on behalf of the Trust or its Academies must immediately inform the relevant Academy or Trust Manager of any breaches of this policy so that appropriate action can be taken to protect confidential information and limit the damage to the reputation of the Academy and the Trust. Any disciplinary action for external contractors should be addressed under the service provider's internal procedures by the authorised parties.

## **Freedom of expression**

- 10.1 The Trust recognises that freedom of expression is a fundamental right and staff members have the right to express their religious, political and philosophical beliefs in the workplace (within limits).
- 10.2 Freedom of expression will not be accepted as justification for making statements or comments that discriminate against or harass, or incite violence or hatred against other people or specific groups, particularly by reference to their protected characteristics.

## **Monitoring Internet Use**

- 11.1 REAch2 recognises that employees have a human right to a private and family life, both in and outside of the workplace. However, these rights must be balanced against the reputation of their employer and the need to maintain business and school-related operations.
- 11.2 The Trust and its Academies reserve the right to take reasonable measures to monitor online correspondence and other communications, including both traffic and content, which may be reviewed in circumstances where there are adequate grounds to suspect a breach of any contractual or statutory duty placed upon individuals, the Trust or its Academies.
- 11.3 The Trust and its Academies will first consider whether any less invasive means can be used to investigate alleged misconduct to minimise the infringement of any legitimate right to privacy.