



*I have come that they may have life and have it to the full
(John10:10)*

SOCIAL MEDIA POLICY

This policy is taken from the OLHOC Trust Handbook of Statutory policies and should be read in conjunction with the other policies within the document.

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SOCIAL MEDIA POLICY

1. Introduction

- 1.1. This policy applies to every individual working for the Trust, irrespective of their status, level or grade. It therefore includes but is not limited to the CEO / Principal / Head Teacher Heads of Department, members of the Senior Leadership Team, governors, trustees, members, directors, employees, consultants, contractors, trainees, volunteers, part-time employees or workers, fixed-term employees, casual and agency staff (collectively referred to “you” and “Staff” in this policy). Third parties who have access to the Trust’s electronic communications systems and equipment, including MIS suppliers / website management, are also required to comply with this policy.
- 1.2. This policy does not form part of any employee’s terms and conditions of employment and is not intended to have contractual effect, except as where expressly stated otherwise in this policy.
- 1.3. The Trust reserves the right to amend this policy at any time, particularly in accordance with the Trust’s data protection obligations and Staff will be notified of any changes no later than one month from the date those changes are intended to have effect.
- 1.4. The Trust understands that the internet and social media platforms are increasingly used as a means of communication both at work and at home. This policy outlines the standards the Trust requires Staff to observe when using social media, the circumstances in which it will monitor the use of social media and the action it will take if this policy is breached.
- 1.5. This policy applies to the use of social media both for work and personal purposes, whether during working hours or otherwise. It applies regardless of whether social media is accessed using the Trust’s network, facilities or equipment or those belonging to you.
- 1.6. The Trust recognises that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of different applications. However, your use of social media can pose a risk to the Trust’s confidential and propriety information, its reputation and it can jeopardise its compliance with legal obligations as well as damaging the professional standing of Staff.
- 1.7. 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 work-related purposes, all Staff are required to comply with the provisions of this policy. It is to be read in conjunction with the Trust’s Electronic Communications Policy, Staff Acceptable Use Policy and Whistleblowing Policy.
- 1.8. Breach of the provisions of this policy may be regarded as a disciplinary offence which may result in disciplinary action up to and including summary dismissal in accordance with the Trust’s Disciplinary Policy and Procedure.

2. Scope and Purpose of this Policy

- 2.1. In this policy “social media” means internet-based applications which allow users to collaborate or interact socially by creating and exchanging content, such as social networks or platforms, community sites, blogs, microblogging sites, wikis, web forums, social bookmarking services and user rating services. Examples include, but are not limited to, Facebook, Snapchat, Instagram, TikTok, LinkedIn, Twitter, Yammer, YouTube, Tumblr, Flickr, SlideShare, Foursquare, Pinterest, Tinder, Grindr etc., the review areas of e-commerce sites and comment sections on internet sites or Apps.

- 2.2. Social media platforms allows all of us to build connections and to share ideas and content more broadly and quickly than ever before, and the Trust supports their use. However, improper use of social media may give rise to a breach of your employment contract and/or the Trust's policies, and/or the following:
 - 2.2.1. bullying, harassment and unlawful discrimination;
 - 2.2.2. defamation (i.e. damaging the good reputation of another person or organisation);
 - 2.2.3. contempt of court (i.e. interfering with the administration of justice, e.g. by revealing someone's identity that had been protected by the courts);
 - 2.2.4. breach of data protection laws;
 - 2.2.5. misuse of confidential information belonging to us or to Staff, students or parents, affiliates, partners, suppliers, vendors or other stakeholders; and
 - 2.2.6. damage to the reputation of the user, the Trust and/or its Staff, students or parents, affiliates, partners, suppliers, vendors or other stakeholders.
- 2.3. This policy does not seek to regulate how Staff use social media in a purely private capacity, provided its use has no bearing on the Trust or its activities.
- 2.4. This policy is intended to ensure that Staff understand the rules governing their use of social media in relation to their work for the Trust, or when referencing the Trust, or where use of social media may affect the Trust or its activities. It is designed to help you use these platforms and services responsibly, so as to minimise the risks set out above and to ensure consistent standards of use of social media.
- 2.5. This policy therefore applies where:
 - 2.5.1. your use of social media relates to the Trust or its activities;
 - 2.5.2. your use of social media relates to, or is otherwise connected with, your work, whether the intended use is personal or professional;
 - 2.5.3. you represent yourself, or are otherwise identifiable, as someone employed by, or otherwise associated with the Trust.

3. Personnel Responsible for Implementing the Policy

- 3.1. The Board of Trustees has overall responsibility for the effective operation of this policy but has delegated day-to-day responsibility for its operation to the Local Governing Body and in turn to their CEO / Principal / Head Teacher.
- 3.2. Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks also lies with the CEO / Principal / Head Teacher in liaison with the IT Manager.
- 3.3. All senior Staff 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.
- 3.4. All Staff are responsible for the success of this policy and should ensure that they take the time to read and understand it.

3.5. Any misuse of social media should be reported to the CEO / Principal / Head Teacher in the first instance. Questions regarding the content or application of this policy should be directed by email the CEO / Principal / Head Teacher.

4. Compliance with Related Policies and Agreements

4.1. Social media should never be used in a way that breaches any of the Trust's other policies. If an internet post would breach any of the Trust's policies in another forum, it will also breach them in an online forum. For example, Staff are prohibited from using social media to:

- 4.1.1. **breach the Trust's Electronic Information and Communications Systems policy and Staff Acceptable Use Policy;**
- 4.1.2. **breach the Trust's obligations with respect to the rules of relevant regulatory bodies;**
- 4.1.3. **breach any obligations the Trust or you may have relating to confidentiality;**
- 4.1.4. **breach the Trust's Disciplinary Rules;**
- 4.1.5. **defame or disparage the Trust, its Staff, its students or parents, its affiliates, partners, suppliers, vendors or other stakeholders;**
- 4.1.6. **harass or bully Staff in any way or breach the Trust's Harassment and Bullying policy;**
- 4.1.7. **unlawfully discriminate against Staff or third parties or breach the Trust's Equal opportunities policy;**
- 4.1.8. **breach the Trust's Data Protection policy (for example, never disclose personal information about a colleague online);**
- 4.1.9. **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).**

4.2. 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 organisation.

4.3. Employees who breach any of the above policies will be subject to disciplinary action up to and including termination of employment. The Trust will take appropriate alternative action against other Staff or third parties.

5. Personal use of Social Media

5.1. You must not use the Trust's computers, networks or systems (including via smartphones or tablet devices) to access social media platforms for personal use at any time.

5.2. Any use of social media platforms is strictly prohibited and permission to use the Trust's systems to access social media platforms for personal use that may be granted by the Trust in exceptional circumstances from time to time may be withdrawn at the Trust's discretion.

5.3. You should not use a work email address to sign up to any social media account and any personal social media page should not make reference to your employment with the Trust (excluding LinkedIn, where prior permission has been provided by from CEO / Principal / Head Teacher).

- 5.4. Staff must not take photos or posts from social media that belong to the Trust for their own personal use.

6. Monitoring

- 6.1. The contents of the Trust's IT resources and communications systems are property of the Trust. Staff should have no expectation of privacy in any message, files, data, document, facsimile, 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.
- 6.2. The Trust reserves the right to monitor, intercept and review, without further notice, Staff activities using the Trust's IT resources and communications systems, including but not limited to social media postings and activities, to ensure that its rules are being complied with and for legitimate business purposes. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving and printing of transactions, messages, communications, postings, logins, recordings and other uses of the systems as well as keystroke capturing and other network monitoring technologies.
- 6.3. The Trust 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.
- 6.4. All Staff are advised not to use the Trust's IT resources and communications systems for any matter that they wish to be kept private or confidential from the Trust.

7. Educational or Extra Curricular Use of Social Media

- 7.1. If your duties require you to speak on behalf of the Trust in a social media environment, you must follow the protocol outlined below.
 - 7.1.1. You may be required to undertake training before you use social media and the Trust may impose certain requirements and restrictions with regards to your activities.
 - 7.1.2. You must obtain the express, written approval from the CEO / Principal / Head Teacher before posting any content on the Trust's social media platforms.
 - 7.1.3. If you are contacted for comments about the Trust for publication on any forum, including in any social media outlet, you must direct the inquiry to the CEO / Principal / Head Teacher if you work at one of the Trust's academies or the Trust CEO, as appropriate, and must not respond without advanced written approval.
 - 7.1.4. In the event of a serious incident / crisis only the Trust's or academy's designated spokesperson should speak on behalf of the Trust or the academy, as appropriate.

8. Recruitment

- 8.1. The Trust will carry out an online search against shortlisted candidates during the recruitment process. The Trust will only search for information that is publicly available online, which may include social media accounts you may hold. Where the Trust does this, it will act in accordance with its data protection and equal opportunities obligations.

9. Responsible Use of Social Media

- 9.1. The following sections of the policy provide Staff with common-sense guidelines and recommendations for using social media responsibly and safely and in accordance with the Trust's safeguarding obligations.
- 9.2. Photographs for Use of Social Media:
 - 9.2.1. Any photos for social media posts may only be taken using Trust cameras / devices or devices that have been approved in advance by the CEO / Principal / Head Teacher.

Where any device is used that does not belong to the Trust all photos must be deleted immediately from the device, once the photos have been uploaded to a device belonging to the Trust.

9.3. Protecting The Trust's Business Reputation:

9.3.1. You should have no expectation of privacy or confidentiality in anything you create or share on social media platforms. When you create or exchange content using social media you are making a public statement. As such, your content will not be private and can be retweeted, copied or forwarded to third parties without your consent. You should therefore consider the potential sensitivity of disclosing information (such as sickness absence information) on a platform. Once sensitive or confidential information (or offensive or defamatory information) has been disclosed, it cannot be recovered, and this may result in liability for both you and the Trust.

9.3.2. Bear in mind that, even if you are using social media in a personal capacity, other users who are aware of your association with the Trust might reasonably think that you speak on the Trust's behalf. You should take account of any adverse impact your content might have on the Trust's reputation or its Staff, students or parents, governors, trustees, member, directors, affiliates, partners, suppliers, vendors or other stakeholders.

9.3.3. When creating or exchanging content on a social media platform, you must at all times comply with your contract of employment with the Trust, the Trust's disciplinary rules and any policies or procedures that may be relevant.

9.3.4. In particular, you must not:

9.3.4.1. not breach the Trust's Harassment and Harassment Policy by harassing or bullying other members of staff;

9.3.4.2. not discriminate against Staff or third parties;

9.3.4.3. not breach The Trust's Data Protection Policy, Electronic Information and Communications Systems Policy, Staff Acceptable use Policy or Whistleblowing Policy and Procedure;

9.3.4.4. respect any confidentiality obligations owed by you or the Trust, and not disclose sensitive material or privacy rights of the Trust or any third party;

9.3.4.5. not create or exchange or link to abusive, obscene, discriminatory, derogatory, defamatory or pornographic content;

9.3.4.6. not upload, post or forward any content belonging to a third party unless you have that third party's consent;

9.3.4.7. ensure that any quotes from third party material are accurate; check that a third-party website permits you to link to it before including a link and ensure that the link makes clear to the user that the link will take them to the third party's site; and

9.3.4.8. not post, upload, forward or post a link to chain mail, junk mail, cartoons, jokes or gossip.

9.3.5. In addition, Staff must not post disparaging or defamatory statements about:

9.3.5.1. the Trust or any of its academies;

9.3.5.2. current, past or prospective Staff as defined in this policy;

- 9.3.5.3. current, past or prospective students;
 - 9.3.5.4. current, past or prospective parents, carers or families of students mentioned above;
 - 9.3.5.5. the Trust's governors, trustees, member, directors, suppliers and service providers; and
 - 9.3.5.6. other affiliates and stakeholders.
- 9.3.6. You should be honest and open but also mindful of the impact your activity on a social network or platform may have to the perception of the Trust.
 - 9.3.7. You should avoid posting in relation to or discussing topics that may be inflammatory, such as politics or religion.
 - 9.3.8. Do not escalate "heated" discussions, try to be conciliatory and respectful and quote facts to lower the temperature and correct misrepresentations. Never contribute to a discussion if you are upset or angry.
 - 9.3.9. If you disclose, whether directly or indirectly, your affiliation to the Trust as a member of Staff, whether past, present or prospective, you must also state that your views do not represent those of the Trust.
 - 9.3.10. If you are uncertain or concerned about the appropriateness of any statement or posting, you should refrain from making the communication until you have discussed it with your line manager or the CEO / Principal / Head Teacher.
 - 9.3.11. If you see content on social media that disparages or reflects poorly on the Trust, its Staff, students, parents, governors, trustees, members, directors, service providers or stakeholders, you are required to report this directly to the CEO / Principal / Head Teacher (or the Trust CEO) without unreasonable delay. All Staff are responsible for protecting the Trust's reputation.
 - 9.3.12. You should review the privacy settings on your personal social media accounts regularly and appropriately restrict the people who can read your posts or comments. Review the content of your social media accounts on a regular basis and delete anything that could reflect negatively on you in a professional capacity or on the Trust.
 - 9.3.13. You should avoid social media communications that might be misconstrued in a way that could damage the Trust's reputation, even indirectly.
 - 9.3.14. Respecting Intellectual Property and Confidential Information
 - 9.3.15. Staff should not do anything to jeopardise the Trust's confidential information and intellectual property through the use of social media.
 - 9.3.16. In addition, Staff should avoid misappropriating or infringing the intellectual property of other educational establishments, companies, firms, organisations and individuals, which can create a liability for the Trust as well as for you personally.

- 9.3.17. Staff must not use Trust logos, slogans or other trademarks, or post any of the Trust's confidential or proprietary information without express prior written permission from the Trust CEO or the CEO / Principal / Head Teacher.
- 9.3.18. To protect yourself and the Trust against liability for copyright infringement, where appropriate, reference sources of particular information you post or upload and cite them accurately. If you have an questions about whether a particular post or upload might violate anyone's copyright or trademark, as the Trust CEO or the CEO / Principal / Head Teacher in the first instance before making the communication.
- 9.3.19. Respecting Colleagues, Students, Parents, Clients, Service Providers and Stakeholders.
- 9.3.20. Staff must not post anything that their colleagues, past, current or prospective students, parents, governors, trustees, members, directors, service providers or stakeholders may find offensive or derogatory, including discriminatory comments, insults or obscenity.
- 9.3.21. Staff must not post anything related to colleagues, past, current or prospective students, parents, governors, trustees, members, directors, service providers or stakeholders without their advanced written permission.

9.4. **Rights to the Trust's Social Media Accounts**

- 9.4.1. **This Section 10 forms part of employees' contract of employment with the Trust.**
- 9.4.2. If, during the course of your employment with the Trust you create or make use of its social media account "Trust Account":
 - 9.4.2.1. to the extent that the rights to the Trust Account do not belong to the social media platform (e.g. LinkedIn, Twitter), they belong to the Trust; and
 - 9.4.2.2. the rights to any database of details created or maintained in connection with the Trust Account belong to the Trust and you must not create or maintain any separate database of those contact details.
- 9.4.3. On termination of your employment for any reason, and when requested by the Trust at any time, you must:
 - 9.4.3.1. provide the Trust with the current login and password details for all Trust Accounts created or used by you; and
 - 9.4.3.2. return any copies of the database relating to each Trust Account and refrain from using any contact details included on that database, except to the extent that those contacts are personal to you or formed part of a database that you created before you joined the Trust.
- 9.4.4. Where any post is going to be made on the Trust's own social media the following steps must be taken:
 - 9.4.4.1. ensure that permission from the child's parent has been sought before the information is used on social media via home school agreements in place at individual schools.

9.4.4.2. ensure that there is no identifying information relating to a child/children in the post - for example, any certificates in photos are blank/without names or the child's name cannot be seen on the piece of work.

9.4.4.3. the post must be positive, relevant and relate to the children, the good work of Staff, the Trust or any achievements.

9.4.4.4. social media can also be used to issue updates or reminders to parents/guardians and The CEO / Principal / Head Teacher will have overall responsibility for this. Should you wish for any reminders to be issued you should contact the CEO / Principal / Head Teacher for permission to make such a post.

9.4.5. The proposed post must be presented to the CEO / Principal / Head Teacher for confirmation that the post can 'go live' before it is posted on any social media site.

9.4.6. The CEO / Principal / Head Teacher will post the information, but all staff have a responsibility to ensure that this has been adhered to.

9.5. Monitoring and Review of this Policy

9.5.1. The Personnel Committee and academy Business Manager, together with the CEO / Principal / Head Teacher, shall be responsible for reviewing this policy from time to time to ensure that it meets legal requirements and reflects best practice. The Board of Trustees has responsibility for approving any amendments prior to implementation.

9.5.2. The CEO / Principal / Head Teacher has responsibility for ensuring that any person who may be involved with administration or investigations carried out under this policy receives regular and appropriate training to assist them with these duties.

9.5.3. If Staff have any questions about this policy or suggestions for additions that they would like to be considered on review, they may do so by emailing the CEO / Principal / Head Teacher in the first instance.

10. Breaches of this policy

10.1. You should note that creating or sharing content on a social media platform may amount to misconduct even if it takes place:

10.1.1. on a personal account with appropriate privacy settings;

10.1.2. outside normal working hours; and/or

10.1.3. without using the Trust's computers, systems and networks.

10.2. You may be required to remove content created or shared by you which the Trust deems to be in breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

- 10.3. If you are found to be in breach of the provisions of this policy, it will be treated as a disciplinary offence which may result in disciplinary action up to and including summary dismissal in accordance with the Trust's Disciplinary Policy and Procedure.
- 10.4. As an alternative, the Trust may withdraw your access to social media platforms on its systems. If you are not an employee, breach of this policy may result in termination of the Trust's contract with you.
- 10.5. You are also reminded that, in certain circumstances, an act that breaches this policy may also constitute a criminal offence.
- 10.6. If, in the course of using social media, you become aware of any misconduct or wrongdoing by Staff, you must report it to your line manager or the CEO / Principal / Head Teacher.
- 10.7. If you feel that you have been harassed or bullied because of material posted or uploaded by a colleague onto a social media platform should inform your line manager or the CEO / Principal / Head Teacher in accordance with the Trust's Harassment and Bullying Procedure.

