

SOCIAL MEDIA POLICY

POLICY STATEMENT

We understand that your personal social media profiles are your own. However, when you post and, more generally, your actions on social media (whether it personal or business use can impact our reputation, our business and jeopardise our compliance with legal obligations (such as to keep personal data secure and certain information confidential).

You must follow this policy and social media responsibly and safely to help us minimise these risks, avoid loss of productivity and make sure that our IT equipment and Information Systems are used appropriately.

Please read our Use of IT Equipment, Information Systems and Data Policy for more information on acceptable standards for internet use.

This policy does not form part of any employee's contract of employment, and it may be amended at any time. We may also vary elements, such as any time limits, as appropriate in any case.

WHO IS COVERED BY THIS POLICY?

This policy applies to all employees, directors, facilitators, mentors and other officers, workers and agency workers.

We also require in any contracts with self-employed consultants or contractors that they comply with this policy. We will ensure they are given access to a copy.

All individuals covered in sections 2.1 and 2.2 are referred to as 'staff' in this policy.

WHO IS RESPONSIBLE FOR THIS POLICY?

While we ask all managers to take responsibility for making sure this policy is complied with, its successful operation also depends on you. Please take the time to read and understand it and to go back to your manager with any questions you may have. References to Directors in this policy mean the most senior people within our organisation.

WHEN THIS POLICY APPLIES

This policy applies to your use of all forms of social media (including Facebook, LinkedIn, Twitter, YouTube, Instagram, Snapchat, Pinterest, WhatsApp, TikTok, Feefo, Trustpilot, Reviews.com, Google Reviews and all other social networking sites, internet postings, messages, apps and blogs).

Please be aware that this policy also applies whether you use social media for business or personal purposes, whether social media is used during working hours or otherwise, and regardless of how you've accessed social media, such as by using:

- IT Equipment, which is any hardware, including all computers, laptops and other mobile devices, USB flash

drives, telephones, (including android and smartphones), fax machines, copiers, scanners, CCTV, and electronic key fobs and cards. This can be your IT Equipment or ours.

- Information Systems, which is anything used to store, process or communicate any information or data (such as the internet, Wi-Fi systems, email, telephone, voicemail or any cloud-based systems or other networks). This can be your Information Systems or ours
- Personal data, which is any personal information about an individual that can be used to identify them, whether directly or indirectly if combined with other information
- Confidential information, which is information that's marked as confidential, or which you're required to keep confidential under your employment contract or other third-party agreements with us. This includes Personal Data and sensitive Special Category Data (as defined in data protection laws).

COMPLYING WITH OTHER POLICIES AND OBLIGATIONS

We have other policies, procedures and obligations that must be followed when you are using social media.

Please be aware that if a social media post would breach any of our policies in one type of forum, it will also breach them in any online forum.

BREACHES OF OUR POLICIES

You must not use social media in a way that breaches any of our other policies, including our policies on:

- Use of IT Equipment, Information Systems and data (IT and E-Safety)
- Anti-harassment and bullying
- Data protection (including disclosing personal data about a colleague online)
- Equality, diversity and inclusion
- Anti--corruption and bribery
- General disciplinary rules and procedures

BREACHES OF OUR OBLIGATIONS

You must not use social media in a way that prevents us from complying with any of our obligations, including:

- To any relevant regulatory authorities
- For confidentiality or intellectual property
- Under any other laws or ethical standards, such as by using social media to:
 - Claim to be someone other than yourself
 - Make false statements
 - Defame or rubbish our organisation or our staff, customers, clients, suppliers, vendors, business partners, affiliates, stakeholders or any other person who could reasonably be associated with us
- Information Systems, which is anything used to store, process or communicate any information or data (such as the internet, Wi-Fi systems, email, telephone, voicemail or any cloud-based systems or other networks). This can be your Information Systems or ours.
- Personal data, which is any personal information about an individual that can be used to identify them, whether directly or indirectly if combined with other information
- Confidential information, which is information that's marked as confidential, or which you're required to keep confidential under your employment contract or other third-party agreements with us. This includes Personal Data and sensitive Special Category Data (as defined in data protection laws).

PERSONAL SOCIAL MEDIA USE AT WORK

You can use your own IT Equipment (such as mobile phones) to access personal social media at work, as long as you use:

- It is minimal and generally takes place outside normal working hours (such as during break times or after work)
- Does not interfere with business or operational commitments
- Does not commit us to any additional costs
- Complies with this and other related policies, including our policies on IT and E-Safety, Use of IT Equipment, Information Systems and Data; Equality and Diversity; Anti-harassment and Bullying; and Data Protection

We may ask you to silence your mobile phone social media notifications during working hours.

Please remember that personal use is a privilege, not a right, and we can withdraw permission or restrict your access if you abuse this privilege.

If you want to use social media for personal use with our IT Equipment or via any of our Information Systems, please only do so in line with our policy on Use of IT Equipment, Information Systems and Data.

We may also monitor your personal use of social media using our IT Equipment or our Information Systems (see MONITORING SOCIAL MEDIA USE below for further details).

RESPONSIBLE USE OF PERSONAL SOCIAL MEDIA ACCOUNTS

We understand that personal social media profiles are your own, however what you post and how you manage your accounts can impact on our reputation and business and may cause us to be liable to other third parties for your actions.

You are personally responsible for what you communicate in social media. Before posting any content, please keep in mind that it might be read by anyone, including us, future employers and social acquaintances, for a long time.

Although some posts on social media may be set to 'private' or can only be viewed by a few, even the most secure privacy settings may not prevent your friends, connections or contacts from passing them on and bringing them into public view.

If you are uncertain or concerned about how appropriate a statement or posting might be, please discuss it with your line manager before publishing it.

In addition to using your common sense when using social media, the following rules can also help:

- Do not identify, mention, comment on, or refer to any information relating to us, staff, our customers or clients, suppliers and vendors, other affiliates and stakeholders or any other people who might be associated with us, unless you have received clear permission to do so beforehand.
- Try to be clear in your social media posts that you are speaking on your own behalf. Write in the first person and use your personal email address when communicating via social media.
- If you mention your affiliation with us on your profile or any social media postings, please make it clear that your views do not represent ours, for example by stating, 'the views in this posting do not represent the views of my employer'. Your profile and any content you post should be consistent with your professional image at work.

All staff are responsible for protecting our organisation, so please notify your line manager if you see content in social media that rubbishes or reflects poorly on us, Staff, our customers or clients, suppliers and vendors, business partners, other affiliates and stakeholders or any other person who might reasonably be associated with us.

RESPONSIBLE USE OF SOCIAL MEDIA

Blogs and social media can be exciting and innovative ways for our organisation to thrive. However, if this type of marketing or business development is not directly part of your role, please do not participate in it without your line manager's approval.

You may be required to create business profiles on social media, and you should not use personal accounts for business use unless you have been authorised by your line manager to do so.

You may, however, include your employment with us on your LinkedIn profile, but please make sure you write accurate information that is not misleading and does not include any confidential information. If you are unsure what to write, please ask your line manager in advance. We may also provide you with wording to describe our activities or your own role with us, which we may require you to use.

If your role requires you to speak on our behalf through social media, and/or you are associated with us on any professional networking site (including LinkedIn), you will still need approval from your line manager for your communications. Your line manager will let you know of any requirements and restrictions on these communications and may require you to have additional training.

The contact details of business contacts you have made while working for us, whether on business or personal accounts, are considered our confidential information. Please follow what is in your contract on handling confidential information, which may include deleting it from your accounts (business or personal) at any time, and at the end of your contract with us.

In addition to the above, we have set out other dos and don'ts when using social media for work:

What you should do:

- Always act in the best interests of our organisation
- Online posting and communications should reflect your level of expertise and should be limited to your area of knowledge
- Use any guidance we give you about our brand, style and values as an organisation to inform your postings
- Try to stimulate interest in the work you do and connect with others by doing similar things to learn from

them

- Try to add value through your posts, such as solving a problem, helping others in the online community or improving our image
- Quickly correct any errors in your posts and be upfront with us about it if necessary
- If you disagree with others online, do so respectfully and objectively to avoid harming your (or our) credibility and reputation
- Review and comply with the terms of use of all social media sites you access. If you need help in identifying the terms of use, please ask your line manager
- If you are contacted for comments about our organisation which will be published, please direct this enquiry to your line manager

What you should not do:

- Do not post anything that might be offensive to others (such as sexual comments or racial slurs) and think carefully before posting on other sensitive topics (such as religion, culture or politics).
- Do not use social media in a false or misleading way, such as by claiming to be someone other than yourself or creating an artificial 'buzz' around us or any business, products or shares.
- Do not refer to our customers, vendors, business associates or investors, and do not identify them by name or post any information (confidential or not) related to them without getting written permission in advance.
- Do not discuss or conduct business with a customer, supplier, business associate or investor in an online forum.

COMMUNICATION / ENGAGEMENT WITH LEARNERS' OUTSIDE OF THE PROVISION

We strongly advise all AP staff to have no communication with learners via social media, especially when outside of the provision.

If a learner does add an AP staff member on social media, they must follow the following steps:

- In the first instance, ignore and delete the request. Block the pupil from viewing your profile.
- Check privacy settings and consider changing your display name or profile picture
- If the pupil asks about the friend request in person, they should tell them that they are not allowed to accept friend requests from pupils and that if the learner persists, that they will have to notify senior leadership and/or their parents/carers. If the pupil persists further, take a screenshot of their request and any accompanying messages
- Notify the senior leadership team or the head of provision about what's happening

For further guidance and information explaining the appropriate and inappropriate use of IT equipment and social media usage with learners and with parents/carers please see the IT and E-Safety policy.

PROVIDING REFERENCES AND RECOMMENDATIONS FOR OTHERS

Do not disclose or comment on our confidential information or any related rumours, including information on sales, customer lists, financials, business or marketing plans, performance or prospects. If asked directly, refer the inquiry to a line manager.

Any references or recommendations you give for others on social or professional networking sites (such as LinkedIn, Feefo, Trustpilot and Facebook) can be attributed to our organisation and create legal liability for both you and us.

With this in mind, please only provide references or recommendations if you are very confident that it will not reflect badly on our organisation or cause any other type of harm or seek approval from your line manager or a director in advance.

MONITORING SOCIAL MEDIA USE

We reserve the right to monitor, intercept and review Staff activities that use our IT Equipment and Information Systems, including for social media, to make sure that our rules are followed and for other legitimate business purposes, and without any prior notice to you. If you use our IT Equipment or our Information Systems, this means you consent to our monitoring.

Please read our IT and E-Safety, Use of IT Equipment, Information Systems and Data Policies for more information.

BREACHES OF THIS POLICY

If you become aware of any misuse of social media, report it immediately to your line manager or a director.

If you are suspected of breaching this policy, you must co-operate with our investigation and provide us with any relevant passwords and login details of the accounts you used (including a professional Twitter or LinkedIn account) if

necessary.

Any breach of this policy, whether during working hours or not, whether using personal or business accounts or whether using our IT Equipment or Information Systems or not, may result in disciplinary action and may lead to dismissal.

Please be aware that you may be required to remove any social media content if we believe that it does not follow this policy, and failure to do so will also be considered a breach of this policy and may result in disciplinary action.

LINKS WITH OTHER POLICIES

This policy is linked to our:

- Information Systems
- Use of IT equipment
- Data protection policy
- IT and E-Safety policy

MONITORING AND REVIEW OF THE POLICY

We keep this policy under regular review:

Review of this Policy: April 2025

Next Review Date: April 2026

Reviewed By: Laura Grant

Position/Role: Director of Freedom Foundation

