



# The Use of Social Media Policy

<b>Issue Date</b>	<b>February 2022</b>
<b>Date of Next Review</b>	<b>February 2023</b>
<b>Responsibility</b>	<b>Quality Director</b>

## **1 Purpose**

1.1 We understand that the internet and mobile communications technology are used by our staff as a means of communication both at work and at home. This policy outlines the standards we require our staff to observe when using social media, the fact that we monitor usage of social media and the action we will take if this policy is breached.

Except where otherwise stated, this policy does not form part of any contract of employment and we may amend it at any time.

## **2 Scope**

2.1 This policy refers to 'employees' but applies to all staff including those who work on DMM premises, such as contract workers and volunteers.

## **3 Responsibilities**

3.1 The responsibility for drafting, updating, monitoring and reviewing this policy belongs to the Quality Director and it will be reviewed at appropriate intervals.

All employees are responsible for complying with the requirements of this policy and for reporting any breaches of the policy to the senior management team.

If you have concerns about information or conduct on social media sites that are inappropriate, offensive, demeaning or could be seen to be bullying, please report this to the senior management team immediately.

3.2 Senior management Team:

- o Ensure any reported incidents are investigated and reported as necessary (following the safeguarding policy and reporting process where required.)
- o Developing and implementing the Social Media policy
- o Facilitating training and guidance on Social Media use.
- o Approve any social media account application and creation.
- o Create social media account following approval
- o Store social media account details including saving passwords securely
- o Monitor the content of any social media accounts
- o Close or transfer any social media account after the lead staff member has left the organisation

3.3 Staff:

- o Know and understand the contents of this and other relevant policies.
- o Ensure that any use of social media is carried out in line with this and other relevant policies.
- o Attend appropriate training as required and directed by the senior management team.

## 4 Definitions and/or Relevant Legislation

### 4.1 Social Media

Social media in the context of education is underpinned by the following legislation:

- o Malicious Communications Act 1988  
Communications Act 2003; Section 127
- o Computer Misuse Act 1990
- o The Counter Terrorism & Security Act (2015) and the Prevent Duty
- o Sexting in Schools and Colleges: Responding to incidents and safeguarding young people. UKCCIS Guidance (2017)
- o Keeping Children Safe in Education, statutory guidance for schools and colleges.
- o Department for Education (2018) Working together to safeguard children, HM Government (2018)
- o Sexual Offences Act 2003

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, community sites, blogs, microblogging sites, wikis, web forums, social bookmarking services and user rating services. Examples include Facebook, LinkedIn, Yammer, YouTube, Instagram, Twitter, Tumblr, Flickr, SlideShare, Foursquare and Pinterest and the review areas of e-commerce sites.

Social media platforms allow us to build connections and to share ideas and content more broadly and quickly than ever before, and we support their use. However, improper use of social media may give rise to a breach of your employment contract and/or our policies, and/or defamation (i.e., damaging the good reputation of another person or organisation), misuse of our confidential information or that of our learners and their employers, our suppliers and/or reputational damage.

This policy does not seek to regulate how staff use social media in a purely private capacity, provided that use has no bearing on Digital Marketing Mentor or its activities. This policy is intended to ensure that staff understand the rules governing their use of social media in relation to their work for us, or when referencing Digital Marketing Mentor, or which may affect us or our 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. This policy therefore applies where:

- o your use of social media relates to Digital Marketing Mentor or its activities;
- o your use of social media relates to or is otherwise connected with your work, whether the intended use is personal or professional;
- o you represent yourself, or are otherwise identifiable, as someone employed by, or otherwise associated with Digital Marketing Mentor.

### 4.2 Monitoring

Our Policy sets out Digital Marketing Mentor's right to monitor, intercept and read communications, and applies equally to the use of social media platforms.

We will also monitor what is said about Digital Marketing Mentor to inform the quality of our provision and the marketing of our services and provision.

## **5 The Policy**

### **5.1 Acceptable use of social media at work**

Digital Marketing Mentor's IT System is first and foremost a business tool and using our system for personal reasons is a privilege not a right, and is subject to the restrictions set out in this policy.

Employees are permitted to make reasonable and appropriate use of social media websites where this is part of the normal duties of their work. If you are responsible for contributing to our social media activities you should remember that you are representing Digital Marketing Mentor and adhere to the following guidelines:

- o Only interact on approved platforms about sector developments;
- o Clearly identify yourself, including your name and job title, and use the following disclaimer: 'The views expressed are my own and do not necessarily reflect the views of Digital Marketing Mentor.'
- o ensure that all communications are of high quality (in terms of content and form) including being grammatically correct, accurate, objectively justifiable, reasonable and appropriate for the intended audience;
- o you must not provide references or recommendations for anyone else on social media (whether employment or business recommendations) in any way that suggests any endorsement or recommendation by Digital Marketing Mentor. If you wish to provide a reference or recommendation, you should seek advice from the senior management team and ensure that any such reference or recommendation can be withdrawn at any time as we may require;
- o if you become aware of adverse criticism of Digital Marketing Mentor, inform the senior management. Do not respond without their express approval;
- o comply with the terms and conditions and policies of the social media platforms you use;
- o maintain good information security practices. Use strong passwords and make appropriate use of security and privacy settings on social media platforms, and follow our email, internet and communications and information security policies, guidelines and standards;
- o seek approval from the senior management team before creating or exchanging comments on the social media accounts of colleagues, learners and their employers, our suppliers or other stakeholders;
- o before you begin communication on a social media platform, evaluate your audience by gaining an insight into the type of content that is published and note any unwritten rules that are followed in discussions.

We accept that employees may wish to use social media channels as a way of communicating personally with the public and/or friends; however, its use at work should be restricted to the terms of this policy. You are permitted to make reasonable and appropriate use of social media websites from Digital Marketing Mentor's IT network during official rest breaks or when you are not on duty (before and after work).

If you wish to use your own personal devices to access social media websites at work, you should limit use to your official rest breaks and/or when you are not on duty (before and after work).

Personal use of social media should not interfere with your work duties and responsibilities. Excessive personal use of social media website and abuse of this policy will be considered a disciplinary offence.

## 5.2 Expected standards of conduct on social media websites

### Appropriate Conduct

You must not use your work email address to sign up for personal social media websites.

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 forwarded to third parties without your consent. You should therefore consider the potential sensitivity of disclosing information (such as health information) to the world. Once sensitive or confidential information (or offensive or defamatory information) has been disclosed, it cannot be recovered and this may result in liability both for Digital Marketing Mentor and also you personally.

Bear in mind that, even if you are using social media in a personal capacity, other users who are aware of your association with Digital Marketing Mentor might reasonably think that you speak on DMM's behalf. You should also bear in mind at all times any adverse impact your content might have on our reputation or customer or supplier relationships.

When creating or exchanging content on a social media platform, you must at all times comply with your contract of employment (or other contractual relationship) with us, our disciplinary rules and any of our policies that may be relevant. In particular you must:

- o not harass or bully other members of staff OR breach our harassment and bullying policy;
- o not promote political or social groups which are not aligned to Digital Marketing Mentor
- o not discriminate against other members of staff, learners and their employers, third parties OR breach our equality and diversity policy;
- o not breach our data protection, or whistleblowing policies;
- o respect any confidentiality obligations owed by you or us, and not disclose commercially sensitive material or infringe any intellectual property or privacy rights of Digital Marketing Mentor or any third party;
- o not make defamatory or disparaging statements about Digital Marketing Mentor, its staff or learners and their employers;
- o not create or exchange or link to abusive, obscene, discriminatory, derogatory, defamatory or pornographic content;
- o not upload, post or forward any content belonging to a third party unless you have that third party's consent;
- o ensure that any quotes from third party material are accurate;

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

You should regularly review the privacy settings on your personal social media accounts and appropriately restrict the people who can read your comments. However, even if privacy and security settings are restricted, you should be aware that anything you post on social media sites may be made public by onward transmission.

You should review the content of your personal social media accounts on a regular basis and delete anything that could reflect negatively on you in a professional capacity or on Digital Marketing Mentor.

You should be honest and open but also be mindful of the impact your contribution to a site may have on the perception of Digital Marketing Mentor.

If you make a mistake in a contribution, be prompt in admitting and correcting it.

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 angry or upset; return to it later when you can contribute in a calm and rational manner.

Avoid discussing topics that may be inflammatory, such as politics or religion.

Users of social media should consider the copyright of the content they are sharing and, where necessary, should seek permission from the copyright holder before sharing.

Users must ensure that their use of social media does not infringe upon relevant data protection laws, or breach confidentiality.

The use of images can be assumed to be acceptable, providing the following guidelines are strictly adhered to.

- o Permission to use any photos or video recordings should be obtained and where these include learners the learner declaration form must be completed to obtain their written consent. If anyone, for any reason, asks not to be filmed or photographed then their wishes should be respected.
- o Once permission has been obtained, under no circumstances should staff share or upload learner pictures online other than via Digital Marketing Mentor owned social media accounts.
- o If a member of staff inadvertently takes a compromising picture which could be misconstrued or misused, they must delete it immediately.

#### Acceptance of friends

Digital Marketing Mentor encourages the positive use of social media as part of the educational process. Social media is used by many people, particularly learners to communicate with their peers and the public. Learners may wish to form personal

relationships with employees, however to ensure professional boundaries are maintained, you must not accept and/or invite learners of any age or past learners under the age of 18, or parents to be 'friends' on personal social media accounts or other online services:

Entering into such relationships may lead to abuse of an employee's position of trust and breach the standards of professional behaviour and conduct expected by us. We reserve the right to take disciplinary action if employees are found to be in breach of this policy, with the potential of dismissal for serious breaches.

Acts of a criminal nature or any safeguarding concerns may be referred to the police, Local Safeguarding Children Board (LSCB) and/or the Independent Safeguarding Authority (ISA).

### 5.3 Use of social media during recruitment and selection process

Digital Marketing Mentor may view relevant social media websites as part of the pre-employment process, i.e. those aimed specifically at the professional market and used for networking and career development (e.g. LinkedIn). Where we do this, we will act in accordance with our data protection and equal opportunities obligations.

### 5.4 Inappropriate conduct and excessive use

We consider this policy to be extremely important. If an employee is found to be in breach of the policy, they will be disciplined in accordance with our disciplinary procedure. In certain circumstances, breach of this policy may be considered gross misconduct, which may lead to immediate termination of employment without notice or payment in lieu of notice. As an alternative, we may withdraw your access to social media platforms via our systems. If you are not an employee, breach of this policy may result in termination of our contract with you.

Employees should note, in particular, that creating or sharing content on a social media platform may amount to misconduct even if it takes place:

- o on a personal account with appropriate privacy settings;
- o outside normal working hours; and/or
- o without using our computers, systems and networks.

Employees who feel that they have been harassed or bullied because of material posted or uploaded by a colleague onto a social media platform should inform the senior management team.

### 5.5 Process for creating new accounts

The staff member must consider how a social media account will help them in their communication and marketing. Anyone wishing to create a Digital Marketing Mentor social media account must present a proposal to the senior management team covering the following points: -

- o The aim of the account
- o The intended audience
- o How the account will be promoted
- o Who will run the account (at least two staff members should be named)
- o The account security measures (passwords, etc)

- o Will the account be open or private/closed

Following consideration by the senior management team the application will be approved or rejected. In all cases, the senior management team must be satisfied that anyone running a social media account on behalf of Digital Marketing Mentor has read and understood this policy and received appropriate training.

### **Declaration**

All employees are required to confirm that they have read and understood the content of the Digital Marketing Mentor Social Media Policy and agreed to comply with its requirements during their employment. They must also confirm that they are fully aware of and accept that Digital Marketing Mentor reserves the right, in accordance with this policy, to monitor internet usage and take appropriate action for non-compliance of this policy.

### **Managing your personal use of Social Media:**

- o Remember “**nothing**” on social media is truly private
- o Social media can blur the lines between your professional and private life. Don't use the Digital Marketing Mentor logo and/or branding on personal accounts
- o Check your settings regularly and test your privacy
- o Keep an eye on your digital footprint
- o Keep your personal information private
- o Regularly review your connections – keep them to those you want to be connected to
- o When posting online consider; Scale, Audience and Permanency of what you post
- o If you want to criticise, do it politely.
- o Take control of your images – do you want to be tagged in an image? What would learners say about you if they could see your images?
- o Know how to report a problem

### **Managing Digital Marketing Mentor's social media accounts**

#### The Do's

- o Check with a senior leader before publishing content that may have controversial implications for Digital Marketing Mentor
- o Use a disclaimer when expressing personal views
- o Make it clear who is posting content
- o Use an appropriate and professional tone
- o Be respectful to all parties
- o Ensure you have permission to 'share' other peoples' materials and acknowledge the author
- o Express opinions but do so in a balanced and measured manner
- o Think before responding to comments and, when in doubt, get a second opinion
- o Seek advice and report any mistakes to the senior management team
- o Consider turning off tagging people in images where possible
- o Social media using only 1-way communication is acceptable. E.G a twitter feed for news.

#### The Don'ts

- o Don't make comments, post content or link to materials that will bring Digital Marketing Mentor into disrepute
- o Don't publish or share confidential or commercially sensitive material
- o Don't breach copyright, data protection or other relevant legislation
- o Consider the appropriateness of content for any audience of Digital Marketing Mentor accounts, and don't link to, embed or add potentially inappropriate content
- o Don't post derogatory, defamatory, offensive, harassing or discriminatory content
- o Don't use social media to air internal grievances
- o Do not add learners to social media.
- o Do not have any private communication with learners via any social media channel