



# Use of Social Media Policy

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PLEASE NOTE THAT ONCE PRINTED THIS IS NO LONGER A CONTROLLED DOCUMENT. PLEASE REFER TO THE INTRANET FOR THE MOST UP TO DATE VERSION.

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# 1 Introduction

TKAT recognises social media as an important means of communication for the organisation (for business use) and something that any employee may wish to use in their own personal capacity (personal private use).

This policy outlines the steps all employees must take to ensure that an appropriate

- **separation** is maintained – between the trust’s business use and individual employee personal private use of social media.
- **balance** is maintained – between personal freedom of expression and the need to protect the reputational risk and business interests of the trust and its academies.

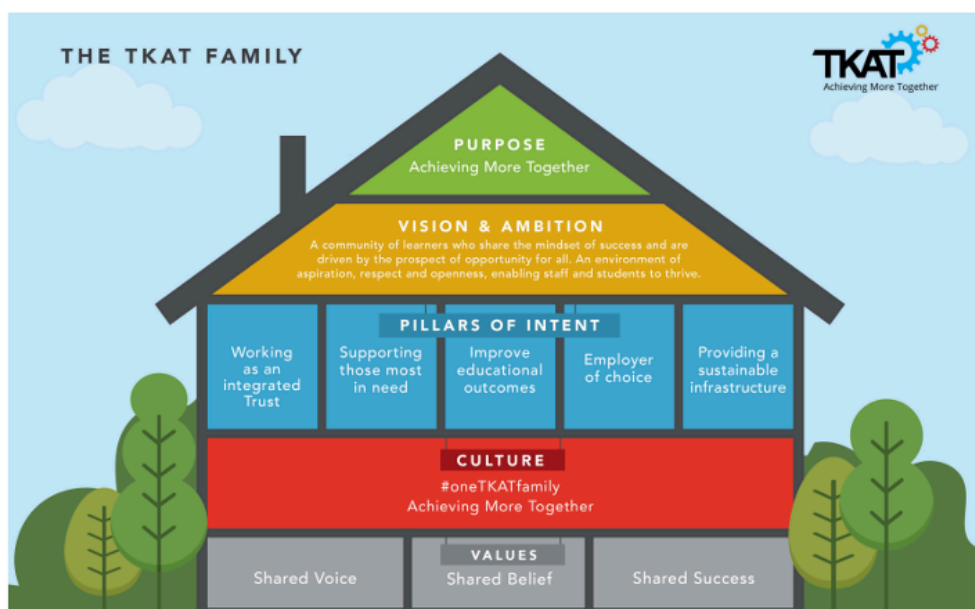
Employees wishing to use social media in a personal private capacity (i) outside the workplace (ii) outside of work time (iii) on their personal device(s) and/or (iv) from their own personal social media accounts should note that:

- While they are not acting on behalf of TKAT and its academies in such circumstances, their conduct online could still cause reputational harm to the trust **and themselves** if they are recognised online as being a TKAT employee.
- Any social media posts, even those that are only intended for close contacts, have the potential to be shared, and as such they are immediately outside an employee’s direct control as soon as they are published online.
- There remains the possibility of disciplinary action if the terms of this policy are not met.

## Vision and Values

The Kemnal Academies Trust (TKAT) aims to foster a culture of the highest professional standards in line with the Trust’s purpose, vision and values.

## TKAT - OUR STRATEGY



## 2 Scope

- 2.1. This policy applies to all employees and workers engaged to work within TKAT and its academies, including Trust Directors, Governing bodies, volunteers whether full time, part time, fixed-term or casual and other individuals who work for or provide services on behalf of the Academy or Trust or anyone carrying out Academy business or who has access to Academy electronic communication systems or equipment.
- 2.2. Social media includes all social networking apps (e.g. Facebook, LinkedIn, Twitter, Instagram), as well as online blogs and discussion forums.
- 2.3. This guidance covers general use of social media, but further detailed guidance on communication with pupils and families can also be found within the **TKAT Code of Conduct** and within each academy's **Safeguarding and Child Protection Policy**.
- 2.4. This policy must be considered in context with the TKAT Code of Conduct, TKAT Safeguarding Policy and the [TKAT Acceptable Use of Technology Policies](#).
- 2.5. Any breaches of this policy will be considered under the TKAT Disciplinary Policy and may result in disciplinary action up to and including dismissal.

## 3 General Rules

- 3.1 Access to social media on the trust/academy's equipment during ordinary business hours is restricted to those authorised to manage the official trust or academy social media accounts (see Section 4 below), and for business purposes only.
- 3.2 Access to social media on personally owned devices must only occur outside working hours, i.e. before and after work, or at lunch or break times.
- 3.3 When using social media, employees
  - 3.3.1 **must not** make any contact with pupils (unless the pupils are family members, *see sections 10 and 27 of the code of conduct*), from a personal social media account, in line with the **TKAT Code of Conduct** and the trust/academy's **Safeguarding and Child Protection Policy**. Employees who are contacted by a pupil through a personal social media account should not respond but should discuss the matter with their line manager immediately.
  - 3.3.2 **should not** make any contact with past pupils, (unless the pupils are family members, *see sections 10 and 27 of the code of conduct*), until the age of 21, from a personal social media account, in line with the **TKAT Code of Conduct** and the trust/academy's **Safeguarding and Child Protection Policy**. Employees who are contacted by a pupil through a personal social media account should not respond but should discuss the matter with their line manager immediately.

- 3.3.3 **must not** conduct themselves in a way that is potentially detrimental to the Trust, or which may bring TKAT or any of its academies, employees, pupils and parents, suppliers and partners into disrepute. Examples include:
- posting, sharing or liking images, video clips or links to other content that are inappropriate in the context of TKAT's values and its reputation within our academies' local communities.
  - publishing photographs, videos or any other types of image of pupils and / or their families on any type of personal webspace.
  - making any comments that could constitute unlawful discrimination, harassment or victimisation relating to any protected characteristics covered by the Equality Act 2010.
  - posting, sharing or liking any images or video clips that are discriminatory or which may constitute unlawful harassment or bullying.
- 3.3.4 **must not** make any derogatory, offensive, discriminatory, untrue, negative, critical or defamatory comments about TKAT or any of its academies, employees, pupils, parents, suppliers and/or other external partners. This includes any information which may enable the reader to identify or recognise someone associated with TKAT and/or its academies.
- 3.3.5 **must not** allow their engagement with social media to harm working relationships with or between employees, pupils and parents, suppliers and partners.
- Examples include criticising or arguing with such persons.
- 3.3.6 **must not** use social media as a method of sharing (for work purposes) or otherwise disclosing personal information about employees, pupils, parents, suppliers and partners.
- This includes any information which may enable the reader to identify or recognise someone else or attempt to identify someone else.
- 3.3.7 **must not** use academy email addresses and other official contact details for setting up personal social media accounts or to communicate through such media.
- 3.3.8 **must not** disclose any trade secrets or confidential, proprietary or sensitive information belonging to the trust or its academies, employees, clients and parents, suppliers and partners, or any information which could be used by one or more competitors.
- Examples include information about the trust or academy's work, products and services, proposed bids, business plans or employees' morale

- 3.3.9 **must not** maintain the publication of any content that breaches this policy if asked, by the trust, to withdraw that publication.
- 3.3.10 **must not** share confidential information about **TKAT** or any of **TKAT's** staff, pupils or clients (which you do not have express authority to disseminate).
- 3.3.11 **must not** use any other statement which is likely to create any liability (whether criminal or civil, and whether for you or us).
- 3.3.12 **must not** share material in breach of copyright or other intellectual property rights, or which invades the privacy of any person.

## 4 TKAT Academies' official social media accounts

- 4.1. TKAT academies and corporate services departments will have named individuals who are authorised to manage its social media accounts, and the template in Appendix 1 below should be customised and maintained for each setting. TKAT senior executives may request to see the completed template for a setting to help ensure that this acceptable use of social media policy is being implemented effectively.
- 4.2. Only these individuals will have approval to publish information via a school or trust social media account. These individuals must have received, as a minimum, guidance on:
  - Securing any required copyright or consent to publish information and/or images.
  - The controls that are in place to check information and data before publication, to reduce the risk of an unintended disclosure of personal, personal sensitive or business sensitive information and to ensure appropriate safeguarding of pupils.
  - Data Protection - Before any images/videos of individuals are shared on corporate social media platforms, consent from the individual or parent/carer should be sought. In the event of withdrawal of consent, the images/videos must be removed from the corporate social media platform by the next working day.
- 4.3. All requests to publish information via social media for the trust/academy's purposes must be made to the relevant colleagues outlined in a setting's authorised list. Employees must not publish any material elsewhere on social media that claims to represent TKAT or its academies.

## 5 Personal private use of social media

Guidance for TKAT employees on the use of social media outside of work time, on personal devices and/or from an employee's own personal social media account, is based on the following principles:

- 5.1 Employees who undertake intended personal private use of social media are advised to use the highest **privacy settings** available – i.e. attempts must be made to restrict the account, for

example, so access to the account is limited – with deliberate consideration of your actual or potential followers and/or connections.

- 5.2 For example, a personal account that can in fact be accessed by colleagues, friends, family, the wider public and others using social media would not be considered as purely for personal private use, and your **conduct** on such an account must adhere to the General Rules outlined in section 3 above.
- 5.3 Caution is advised when inviting work colleagues to be ‘friends’ in personal social networking sites. Social networking sites blur the line between work and personal lives and it may be difficult to maintain professional relationships or it might be just too embarrassing if too much personal information is known in the workplace.

## 6 Protecting employee personal information

- 6.1. Staff members are strongly advised to ensure that they set the privacy levels of their personal sites as strictly as they can and to opt out of public listings on social networking sites to protect their own privacy. Staff members should keep their passwords confidential, change them often and be careful about what is posted online; it is not safe to reveal home addresses, telephone numbers and other personal information. It is a good idea to use a separate email address just for social networking so that any other contact details are not given away.
- 6.2. Employees must be aware of their own personal online security when using social media.
- 6.3. Employees should take appropriate steps to reduce the risk of
- **identity theft** – by using any available privacy settings to ensure that access to their account is limited.
  - **their other online accounts being compromised** – by not posting passwords, or any personal information that has been used as a password (or part of a password) such as birthdays, place of birth, names of spouse, children and/or pet.\*

\* Such personal information should not be used as a password for any TKAT academy system or account.

- 6.4. Should an employee suspect that their online security has been breached, they should follow TKAT’s Personal Data Breach Notification Procedure. They should contact [it.help@tkat.org](mailto:it.help@tkat.org) for further information on how to do this.

## 7 Legislation

- 7.1. Acceptable use of social networking must comply with UK law. In applying this policy, the Trust will adhere to its rights, responsibilities, and duties in accordance with the following:
- Regulation of Investigatory Powers Act 2000
  - General Data Protection Regulations (GDPR) 2018
  - The Human Rights Act 1998
  - The Equality Act 2010
  - The Defamation Act 2013
- 7.2. The internet is a fast-moving technology, and it is impossible to cover all circumstances or emerging media – the principles set out in this policy must be followed irrespective of the

medium. When using social media, employees should be aware of the potential impact on themselves and the employer, whether for work-related or personal use; whether during working hours or otherwise; or whether social media is accessed using the employer's equipment or using the employee's equipment. Employees should use discretion and common sense when engaging in online communication.



## Appendix 1 - Authorised users of social media

We will use a google form that will record staff who are authorised to manage social media business profiles on behalf of an academy/TKAT corporate services. The form will be completed by the relevant SRO (senior responsible officer) for social media use. The google form will confirm that authorised users have received appropriate guidance and support, as set out in Section 4 of TKAT's acceptable use of social media policy.

The response sheet will look something like this

<b>Employee (Full name)</b>	<b>Job title/Dept</b>	<b>Social Media Account(s)</b>
<i>e.g. Marcus Blog</i>	<i>Business Manager</i>	<i>Twitter, Facebook</i>