

Staffordshire University Academies Trust		Trust Policy Document		
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Policy Owner:	Operations Manager	Page: 1 of 9		
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Social Media Policy

1. About this policy

This policy is in place to minimise the risks to Staffordshire University Academies Trust (SUAT) and its employees through use of social media and to provide guidance for staff to ensure that social media is used responsibly.

This policy deals with the use of all forms of social media, including but not limited to Facebook, MySpace, LinkedIn, Twitter, Google+, Wikipedia, Whisper, Instagram, Vine, flickr, YouTube, Tumblr, TikTok and all other social networking sites, internet postings and blogs. It applies to the use of social media for SUAT business as well as personal use that may affect the Trust and its Academies in any way.

This policy does not form part of any employee's contract of employment and the Trust may amend it at any time.

2. Scope

This policy applies to SUAT's Trust Board and Local Academy Councils, all teaching and non-teaching staff, trainee teachers, other trainees, volunteers, agency staff and individuals or external contractors who provide services to the Trust. These individuals are collectively referred to as staff in this policy.

This policy applies to the personal use of social media and the use of social media for official Trust / Academy purposes. This includes any social media sites hosted or maintained on behalf of the Trust and its Academies.

The purpose of this policy is to encourage good practice, to protect the Trust and its employees, and to promote the effective use of social media as part of Academy and Trust activities. The policy applies regardless of whether the social media is accessed using the Academy or Trust IT facilities and equipment, or equipment belonging to members of staff, however in accordance with the Information Security Policy, staff should only access official Academy and Trust social media accounts using secure work devices.

Personal communications via social media accounts that are likely to have a negative impact on professional standards or the Trust's reputation are within the scope of this policy.

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3. Personnel responsible for implementing the policy

The Trust Board has overall responsibility for the effective operation of this policy, but has delegated day-to-day responsibility for its operation to the CEO.

Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks lies with Operations Manager who will review this policy regularly to ensure that it meets legal requirements and reflects best practice.

Line managers 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. Line Managers may also refer employees to the staff code of conduct.

All staff using social media should ensure that they take the time to read and understand the contents of this policy. Any misuse of social media in an Academy should be reported to the Principal and then, where necessary, to the CEO. Any misuse of social media in the Trust central team should be reported to the CEO. Questions regarding the content or application of this policy should be directed to the Operations Manager / Finance Director.

Employees should:

- Be aware of their online reputation and recognise that their online activity has the potential to be seen by others including parents, pupils and colleagues on social media.
- Ensure that their personal social media accounts are protected in accordance with the most up to date guidance.
- Ensure that any use of social media is carried out in line with this policy and other relevant policies of the Trust, for example, the Information Security Policy and Mobile Phone Policy.
- Be aware that any excessive use of social media at work may result in disciplinary action
- Be responsible for their words and actions in an online environment. They are therefore advised to consider whether any comment, photograph or video that they are about to post on a social networking site is something that they want pupils, colleagues, other employees of the Trust, or even future employers, to read.
- Ensuring that they have authorisation to make any posts to social media sites for official Academy or Trust purposes, and that there is appropriate written consent in place for any personal information which is planned to be shared online.

Managers are responsible for:

- Addressing any concerns and/or questions employees may have on the use of social media.
- Operating within the boundaries of this policy and ensuring that all staff understand the standards of behaviour expected of them.
- Giving specialist advice on the use of social media (with support from HR professionals as required).
- Implementing this policy and providing feedback to the Trust if they feel that a review of content is required.

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4. Compliance with related policies and agreements

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:

- Breach the Trust's obligations with respect to the rules of relevant regulatory bodies;
- Breach any obligations contained in those policies relating to confidentiality;
- Breach the Trust's Disciplinary Policy or procedures;
- Harass or bully other staff in any way;
- Unlawfully discriminate against other staff or third parties;
- Breach the Trust's Data Protection Policies; or
- Breach any other laws or regulatory requirements.

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 Trust.

Staff who breach any of the above policies will be subject to disciplinary action.

5. Data protection

All staff are bound by a duty of confidentiality in relation to information obtained during the course of their employment.

The Trust is committed to protecting the confidentiality of information covered by the Data Protection Act 2018 and the UK General Data Protection Regulation. This will include (but is not limited to):

- Pupil information/personal data;
- Staff records/personal data; and
- Commercially sensitive information relating to the Trust and/or Academies.

Definitions of personal data / personal information can be found in the Data Protection Policy. This includes the use of photographs which are also defined as personal data under data protection laws. Those using photographs on social media for official Academy / Trust purposes must revert to the Use of Images Policy for further guidance and information.

6. Personal use of social media

Personal use of social media is never permitted during working hours or by means of the Trust's computers, networks and other IT resources and communications systems.

Staff must be aware that Academy IT and communication systems are remotely monitored by designated, authorised staff, for safeguarding purposes. Language or images that are used or otherwise searched for using official IT systems which trigger a violation of the acceptable use policy will be notified to the designated person.

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Staff should at all times keep their personal use of social media separate from their professional use of social media (where use of social media on behalf of the Trust or Academies is permitted under this policy and staff members have been authorised to use official Trust or Academy social media pages).

When using any personal social media sites, staff must not:

- Identify themselves as employees of the Trust;
- Contact pupils from the Trust's Academies or any other school (unless the pupil is a family member and the member of staff does not pass on any confidential information gained during the course of their employment to that family member);
- Contact members of a pupil's family;
- Accept a friend request from a pupil or a pupil's family members (unless they are a member of their family);
- Post any details or information obtained during the course of their employment with the Trust;
- Post any photographs, videos or any other type of image of pupils, in particular pupils wearing their uniform;
- Post any photographs, videos or other type of image of other staff members wearing clothing that could be associated with the Trust's Academies;
- Post the contact details of the Trust and its Academies on any personal social media papers;
- Link any official contact details for the Trust or its Academies email addresses to their personal online social media accounts or use these addresses to communicate;
- Use part copies of any logos or brands linked to the Trust and its Academies;
- Put themselves in a situation where there is conflict between their personal interests and the interests of the Trust; and
- Post anything on their personal social media sites which could bring the Trust and its Academies into disrepute.

Staff must not upload any content on to social media sites that:

- Is confidential to the Trust or its staff
- Amounts to bullying
- Amounts to unlawful discrimination, harassment or victimisation
- Contains lewd, sexually explicit, threatening or similarly inappropriate or offensive comments, images or video clips
- Undermines the reputation of the Academy and/or individuals
- Is defamatory or knowingly false
- Breaches copyright
- Is in any other way unlawful

Employees should be aware of both professional and social boundaries and should not therefore accept or invite 'friend' requests from pupils or ex-pupils or from parents on their personal social media accounts. All communication with parents via social media should be through the Academy's social media accounts. Employees should note that the use of social media accounts during lesson time is not permitted.

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Staff must report any communications received from current pupils or family members of current pupils on their personal social media site to the Principal or, where necessary, the CEO.

Staff must not edit online encyclopaedias such as Wikipedia in a personal capacity whilst at work using IT equipment owned by the Trust.

7. Prohibited use

Staff must avoid making any social media communications that could damage the Trust and its Academies interests or reputation, even indirectly.

Staff must not express opinions on the Trust and its Academies behalf via social media, unless expressly authorised to do so by the CEO. Staff may be required to undergo training in order to obtain such authorisation.

Staff must not post comments about sensitive topics, such as the Trust or its Academies performance, or do anything to jeopardise its confidential information or intellectual property on any social media sites.

Staff must report any misuse of social media to the Principal or, where necessary, the CEO.

8. Safeguarding

Any content or online activity which raises a safeguarding concern must be reported to the designated safeguarding lead within the Academy. Any online concerns should be reported as soon as identified because urgent steps may need to be taken to support the child. With regard to personal safeguarding, staff should report any harassment or abuse they receive online while using their work accounts.

Staff should never engage with cyberbullying incidents. If in the course of employment with Trust, staff discover a website containing inaccurate, inappropriate or inflammatory written material relating to the staff member, or images of the staff member which have been taken and/or which are being used without permission, this should immediately be reported to a senior manager at the Academy or Trust.

Staff should keep any records of the abuse such as text, emails, voicemail, website or social media. If appropriate, screen prints of messages or web pages could be taken and the time, date and address of site should be recorded.

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9. Use of social media on behalf of the Trust and its Academies

Any use of social media on behalf of the Trust and its Academies must be approved by the Principal or, where necessary, the CEO. Staff may be required to undergo training before they use social media on behalf of the Trust and its Academies, or certain requirements and restrictions may be imposed with regard to the use of social media on behalf of the Trust and its Academies.

Staff must not create social media accounts on behalf of the Trust and its Academies without obtaining prior written approval to do so from the Principal or CEO.

Any use of social media on behalf of the Trust and its Academies must be in accordance with the rules and regulations of the social media service provider, particularly with regards to minimum age requirements.

Staff members must act in the best interests of the Trust and its Academies, its staff and its pupils when using social media on behalf of the Trust and its Academies and must not post anything online which could be interpreted as being discriminatory, derogatory, defamatory or abusive, conflict with safeguarding obligations, or would otherwise cause the reputation of the Trust and its Academies to be damaged.

Any communications on behalf of the Trust and its Academies using social media must be made from an official Trust or academy social media account.

If a member of staff is contacted for comments about the Trust and its Academies for publication anywhere, including in any social media outlet, they must direct the enquiry to the Principal or, where necessary, the CEO, and must not respond without written approval.

Staff must not represent their personal views as those of the Trust and its Academies when using social media on behalf of the Trust and its Academies.

10. Guidelines for responsible use of social media

Staff should:

- Make it clear in social media postings, or in their personal profile, that they are speaking on their own behalf. Staff should write in the first person and link a personal e-mail address to their account;
- Keep all personal log-in information and passwords confidential. Staff are advised not to disclose personal contact information on any social media site;
- Set their privacy settings to the highest possible levels on all personal social media sites; and
- Be respectful to others when making any statement on social media and be aware that they are personally responsible for all communications which will be published on the internet for anyone to see.

If a member of staff discloses their affiliation with the Trust and its Academies on their profile or in any social media postings, they must state that their views do not represent those of the Trust and its Academies (unless they are authorised to speak on behalf of the Trust and its Academies as set out in this policy).

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Staff should also ensure that their profile and any content they post is consistent with the professional image they present to pupils and colleagues.

If a member of staff is uncertain or concerned about the appropriateness of any statement or posting, they must refrain from posting it until they have discussed it with the Principal or, where necessary, the CEO.

If a member of staff sees social media content that disparages or reflects poorly on the Trust and its Academies, they should contact the Principal or, where necessary, the CEO.

11. Inappropriate use of social media

Following a report of inappropriate use of social media, a senior manager will conduct a prompt investigation, provided that the senior manager is not involved in the incident. If in the course of the investigation, it is found that a pupil submitted the material to the website, the behaviour policy will be followed.

The senior manager, where appropriate, will approach the website hosts to ensure the material is either amended or removed as a matter of urgency, i.e. within 24 hours. If the website requires the individual who is complaining to do so personally, the Academy will give their full support and assistance. Checks will be carried out to ensure that the requested amendments or removals are made. If the website(s) does not co-operate, the senior manager will contact the internet service provider (ISP) as the ISP has the ability to block access to certain sites and, in exceptional circumstances, can close down a website.

If the material is threatening and/or intimidating, senior management will, with the member of staff's consent, report the matter to the police. The member of staff will be offered full support and appropriate stress counselling.

Inappropriate use of official social media pages by third parties e.g. comments on official social media pages will be hidden or removed.

12. Security of Social Media Platforms

Work social media accounts must be appropriately secured in accordance with the E-Safety and Information Security policies, including that:

- Only staff who are authorised to use social media accounts will be provided with a login.
- Only authorised posts to social media accounts can be made.
- No images or personal information can be shared via social media if there is not consent from the individual / data subject, to do so.
- Passwords must follow the password requirements set in the Information Security Policy; being of appropriate length and complexity.
- Passwords should be changed on a termly basis.
- Where multi factor authentication is available for accessing the social media account, this should be used.

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- Accounts should not be capable of being 'automatically followed', third parties must have to request access to the account e.g. via a friend request.
- Accounts should be set to private.
- Ensure that the email address linked to the account is up to date.
- Only use trusted and vetted applications.
- Ensure that the account cannot be added to groups without prior approval.
- Do not click on suspicious links or adverts.

13. Breaches of this policy

Any member of staff suspected of committing a breach of this policy (or if complaints are received about unacceptable use of social networking that has potentially breached this policy) will be investigated in accordance with the Trust's anti-bullying or disciplinary procedures. The member of staff will be expected to co-operate with the investigation which may involve:

- Providing relevant passwords and login details
- Printing a copy or obtaining a screenshot of the alleged unacceptable content
- Determining that the responsibility or source of the content was in fact the member of staff.

The seriousness of the breach will be considered including the nature of the content, how long the content remained visible on the social media site, the potential for recirculation by others and the impact on the Academy / Trust or the individuals concerned.

Staff should be aware that actions online can be in breach of the harassment/IT/equality policies and any online breaches of these policies may also be treated as conduct issues in accordance with the disciplinary procedure. If the outcome of an investigation leads to disciplinary action, the consequences will be managed in accordance with the appropriate procedures. Where conduct is considered to be unlawful, the matter would be reported to the police and other external agencies. Staff may be required to remove any social media content that the Trust considers to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

Any providers contracted by the Trust or its Academies must inform the Principal or CEO immediately if a breach of this policy comes to light so that appropriate action can be taken to limit's any reputational damage to the Trust and to protect any confidential information. If further action is necessary in relation to these breaches, it's should be taken in accordance with the provider's disciplinary procedure.

14. Monitoring

The Trust reserves the right to monitor, intercept and review, without further notice, staff activities using its IT resources and communications systems, including but not limited to social media postings and activities, for safeguarding and cyber security purposes.

For further information, please refer to the SUAT E-Safety Policy and Information Security Policy.

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This policy will be reviewed on a two yearly basis and, in accordance with the following, on an as-and-when-required basis:

- Legislative changes
- Good practice guidance
- Case law
- Significant incidents reported
- Incidents occurring on a regular basis

15. Recruitment

In accordance with our Recruitment Manual and KCSIE 2022, as part of the applicant shortlisting process, Academies should consider carrying out an online search as part of their due diligence on the shortlisted candidates.

This may help identify any incidents or issues that have happened, and are publicly available online, which they might want to explore with the applicant at interview.

Job applicants will be provided with a privacy notice which notifies them that searches will potentially be made for information which has been made publicly available and accessible via online platforms.