



## Hamblin Education Trust Social Media Policy

<b>Trust Lead:</b>	<b>Director/HR</b>
<b>Nominated Lead Member of Staff:</b>	<b>Executive Head/Headteacher/CFOO/ Head of IT Operations</b>
<b>Status</b>	<b>Statutory</b>
<b>Last Review Date:</b>	<b>Spring Term 2021</b>

### Objective

The purpose of this policy is to minimise the risks to the Hamblin Education Trust<sup>1</sup> through use of social media. The policy deals with the use of all forms of social media and applies to the use of social media for business purposes as well as personal use that may affect the Trust in any way.

This policy does not form part of your contract of employment and we may amend it at any time.

### Policy

- The Directors of the Trust and nominated lead members of staff have approved this Social Media Policy
- It is the Policy of the Hamblin Education Trust that social media should never be used in a way that breaches any other Trust policies. For example, you are prohibited from using social media to:
  - breach our IT Code of Conduct and Cyber Security policies;
  - breach our obligations with respect to the rules of relevant regulatory bodies;
  - breach any obligations contained in those policies relating to confidentiality;
  - breach our Disciplinary Policy or procedures;
  - harass or bully other staff in any way;
  - unlawfully discriminate against other staff or third parties OR breach our Equal Opportunities Policy;
  - breach our Data Protection Policy (for example, never disclose personal information about a colleague online); or
  - breach any other laws or regulatory requirements.
- You should never provide references for other individuals on social or professional networking sites, as these references, positive and negative, can be attributed to the Trust and create legal liability for both the author of the reference and the Trust.
- If you breach any of the above policies, you will be subject to disciplinary action up to and including termination of employment.

### **Personal use of social media during working hours**

- Occasional personal use of social media during non-working hours (eg. breaks and lunchtimes) is permitted so long as it does not involve unprofessional or inappropriate content, does not interfere with your employment responsibilities or productivity and complies with this policy.

### **Monitoring use of social media during work time**

The Trust reserves the right to monitor employees' use of social media<sup>3</sup> on the organisation's equipment. The Trust considers that valid reasons for checking an employee's internet usage include suspicions that the employee has:

- been using social media when he/she should be working; or
- acted in a way that is in breach of the rules set out in this policy.

### **Prohibited use**

- You must avoid making any social media communications that could damage the reputation or business interests of the Trust, even indirectly.
- You must not use social media to defame or disparage the Trust, its staff or any third party; to harass, bully or unlawfully discriminate against staff or third parties; to make false or misleading statements; or to impersonate colleagues or third parties.
- You must not express opinions on the Trust's behalf via social media, unless expressly authorised to do so by Trust Directors. You may be required to undergo training in order to obtain such authorisation.
- You must not post comments about sensitive business-related topics, such as our performance, or do anything to jeopardise confidential information and intellectual property. You must not include our logos or other trademarks in any social media posting or in your profile on any social media.

### **Guidelines for responsible use of social media**

- You should make it clear in social media postings, or in your personal profile, that you are speaking on your own behalf. Write in the first person and use a personal (not work provided) social media account/email address.
- Be respectful to others when making any statement on social media and be aware that you are personally responsible for all communications which will be published on the internet for anyone to see.
- If you disclose your affiliation with us on your profile or in any social media postings, you must state that your views do not represent those of your employer (unless you are authorised to speak on our behalf). You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.
- If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with your line manager.
- If you see social media content that disparages or reflects poorly on us, you should contact either the Head Master, the CFOO or the HET Head of IT Operations.
- The Trust cannot support any employee who engages in unsuitable communications with pupils.

- If engaging with a third party, for example for the duration of a trip or event, please exercise caution and consider possible safeguarding implications. When posting images of pupils take care not to include their full names/tutor group or any details that could be used to identify them outside of school. Critically, do check that they/their parents/custodians have given consent for their image/name to appear online.
- When using social media for teaching uses (such as department Twitter feeds), ensure all posts are for teaching purposes only and relevant to the department's subject.
- When using a social media account for a trip, ensure consent has been obtained beforehand from parents and the Head Teacher.

### **Breach of this policy**

- Breach of this policy may result in disciplinary action up to and including dismissal.
- You may be required to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may, result in disciplinary action.

### **Notices**

1. The Hamblin Education Trust refers to the Trust itself, its member schools, all employees, officers, consultants, contractors, volunteers, casual workers and agency workers.
2. Social media includes Facebook, LinkedIn, Twitter, Google+, Wikipedia, Instagram and all other such social networking sites, internet postings and blogs.
3. Monitoring will be conducted in accordance with an impact assessment that the Trust has carried out to ensure that monitoring is necessary and proportionate. Monitoring is in the Trust's legitimate interests and is to ensure that this policy on use of social media is being complied with:
  - a. The Data Controller is the Chief Finance Operating Officer. The Trust has appointed RADCaT as its Data Protection Officer.
  - b. Monitoring may consist of checking the social media sites that an employee has visited, the duration of such visits and the content that the employee has contributed on such sites.
  - c. Monitoring will normally be conducted by the IT Technical Support Team. The information obtained through monitoring may be shared internally, including with members of the HR team, an employee's line manager, managers in the business area in which the employee works and IT staff if access to the data is necessary for performance of their roles. However, information would normally be shared in this way only if the Trust has reasonable grounds to believe that there has been a breach of the rules set out in this policy.
  - d. The information gathered through monitoring will be retained only long enough for any breach of this policy to come to light and for any investigation to be conducted. Data is normally securely destroyed after 1 month. The Trust does not apply automated decision-making to the data obtained through monitoring.

- e. Information obtained through monitoring will not be disclosed to third parties except where the Trust is under a duty to report matters to a regulatory authority or to a law enforcement agency.